

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

TEHUM CARE SERVICES, INC.,¹

Debtor.

Chapter 11

Case No. 23-90086 (CML)

**SUMMARY COVERSHEET TO FIRST INTERIM FEE APPLICATION
OF BERRY RIDDELL LLC FOR COMPENSATION FOR SERVICES
RENDERED AND FOR REIMBURSEMENT OF EXPENSES INCURRED
AS CO-COUNSEL TO THE OFFICIAL COMMITTEE OF TORT CLAIMANTS
FOR THE PERIOD FROM NOVEMBER 22, 2023, THROUGH JUNE 30, 2024**

Name of Professional:	Berry Riddell LLC
Authorized to Provide Professional Services to:	Official Committee of Tort Claimants
Date Order of Employment Signed:	January 24, 2024, effective as of November 22, 2023 [ECF No. 1293]
Interim Application (X) Final Application ()	First Interim Fee Application
Time Period Covered by this Application for which interim compensation has not previously been awarded:	November 22, 2023 – June 30, 2024
Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case? Yes	
Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed? Yes	
Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases? Yes	
Do expense reimbursements represent actual and necessary expenses incurred? Yes	
Amount of retainer received in case:	N/A
Total professional fees covered by this statement:	\$277,771.00
Total professional hours covered by this statement:	585.0
Average hourly rate for professionals:	\$474.82

¹ The last four digits of the Debtor's federal tax identification number is 8853. The Debtor's service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.

Total paraprofessional fees covered by this statement:	\$0
Total paraprofessional hours covered by this statement:	0
Average hourly rate for paraprofessionals:	\$0
Total fees requested in this Application:	\$222,216.80
Total expense reimbursements requested in this Application:	\$16,530.08
Total fees and expenses requested in this Application:	\$238,746.88
Total fees and expenses requested in all prior Applications:	N/A

Plan Status: The Debtor filed a second amended disclosure statement in October 2023. The proposed plan was withdrawn.

Primary Benefits: Throughout the Application Period, as co-counsel to the TCC, Berry Riddell: (i) met with and advised Committee members and their advisors, (ii) engaged in multiple mediation sessions that resulted in an agreement among the TCC, UCC, and the Debtor, (iii) objected to the Debtor's and the UCC's Rule 9019 Motion (D.I. 1386), which provided an opportunity for the TCC negotiate a new agreement, (iv) moved to dismiss the Debtor's chapter 11 case (D.I. 1260 & 1404), (v) propounded discovery, deposed witnesses, and analyzed documents produced by parties, (vi) moved to compel discovery or to preclude the Debtor and the UCC from offering certain evidence at trial (D.I. 1418 & 1422); and (vii) objected to the Debtor's exclusivity motion and DIP financing (D.I. 1303 & 1332).

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:

TEHUM CARE SERVICES, INC.,¹

Debtor.

Chapter 11

Case No. 23-90086 (CML)

**FIRST INTERIM FEE APPLICATION OF BERRY RIDDELL LLC FOR
COMPENSATION FOR SERVICES RENDERED AND FOR REIMBURSEMENT OF
EXPENSES INCURRED AS CO-COUNSEL TO THE OFFICIAL COMMITTEE OF
TORT CLAIMANTS FOR THE PERIOD FROM NOVEMBER 22, 2023, THROUGH
JUNE 30, 2024**

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at <https://ecf.txsb.uscourts.gov/> within twenty-one days from the date this motion was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this motion was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

Berry Riddell LLC (“Berry Riddell”), co-counsel to the Official Committee of Tort Claimants (the “TCC”), hereby submits its *First Interim Fee Application of Berry Riddell LLC for Compensation for Services Rendered and for Reimbursement of Expenses as Co-Counsel to the Official Committee of Tort Claimants for the Period from November 22, 2023 through June 30, 2024* (the “Application”) for interim allowance of compensation for professional services provided in the amount of \$222,216.80 and reimbursement of actual and necessary expenses in the amount of \$16,530.08 that Berry Riddell incurred for the period from November 22, 2023 through

¹ The last four digits of the Debtor’s federal tax identification number is 8853. The Debtor’s service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.

June 30, 2024 (the “**Application Period**”). In support of this Application, Berry Riddell attaches the following exhibits:

EXHIBIT	DESCRIPTION
A	First Monthly Fee Statement of Berry Riddell LLC for Compensation for Services Rendered and for Reimbursement of Expenses Co-Counsel to the Official Committee of Tort Claimants for the Period from November 22, 2023 through January 31, 2024 [Docket No. 1437]
B	Second Monthly Fee Statement of Berry Riddell LLC for Compensation for Services Rendered and for Reimbursement of Expenses Co-Counsel to the Official Committee of Tort Claimants for the Period from February 1, 2024 through February 29, 2024 [Docket No. 1445]
C	Third Monthly Fee Statement of Berry Riddell LLC for Compensation for Services Rendered and for Reimbursement of Expenses Co-Counsel to the Official Committee of Tort Claimants for the Period from March 1, 2024 through March 31, 2024 [Docket No. 1494]
D	Fourth Monthly Fee Statement of Berry Riddell LLC for Compensation for Services Rendered and for Reimbursement of Expenses Co-Counsel to the Official Committee of Tort Claimants for the Period from April 1, 2024 through April 30, 2024 [Docket No. 1561]
E	Fifth Monthly Fee Statement of Berry Riddell LLC for Compensation for Services Rendered and for Reimbursement of Expenses Co-Counsel to the Official Committee of Tort Claimants for the Period from May 1, 2024 through May 31, 2024 [Docket No. 1595]
F	Sixth Monthly Fee Statement of Berry Riddell LLC for Compensation for Services Rendered and for Reimbursement of Expenses Co-Counsel to the Official Committee of Tort Claimants for the Period from June 1, 2024 through June 30, 2024 [Docket No. 1628]

NOTICE

Pursuant to the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Docket No. 357] (the “**Interim Compensation Order**”), notice of this Fee Application will be provided to the Application Recipients (as defined in the Interim Compensation Order).

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Dated: July 24, 2024
Scottsdale, AZ

Respectfully submitted,

BERRY RIDDELL LLC

/s/ Michael W. Zimmerman

Michael W. Zimmerman (*pro hac vice*)

Martin A. Aronson (*pro hac vice*)

Jeffrey D. Gross (*pro hac vice*)

6750 E. Camelback Road, Suite 100

Scottsdale, AZ 85251

Email: mz@berryriddell.com

ma@berryriddell.com

jd@berryriddell.com

CERTIFICATE OF SERVICE

I certify that on July 24, 2024, I caused a true and correct copy of the foregoing document to be served by the Court's CM/ECF notification system, which will send notice of electronic filing to all counsel of record.

/s/ Lynda Kogutkiewicz

EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

TEHUM CARE SERVICES, INC.,¹

Debtor.

Chapter 11

Case No. 23-90086 (CML)

**FIRST FEE STATEMENT OF BERRY RIDDELL LLC FOR COMPENSATION FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS CO-COUNSEL
TO THE OFFICIAL COMMITTEE
OF TORT CLAIMANTS FOR THE PERIOD FROM NOVEMBER 21, 2023 THROUGH
JANUARY 31, 2024**

In accordance with the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals [ECF No. 357], each Application Recipient receiving notice of this monthly fee statement shall have until 4:00 p.m. (CT), 14 days after service of this monthly fee statement to object to the fees and expenses requested herein. Upon the expiration of such 14-day period, the Debtor is authorized and directed to pay 80% of the fees and 100% of the expenses requested in this monthly fee statement that are not subject to an objection.

Name of Professional:	Berry Riddell LLC
Authorized to Provide Professional Services to:	Official Committee of Tort Claimants
Date Order of Employment Signed:	January 24, 2024, as of November 21, 2023 [ECF No. 1293]
Time Period Covered:	November 21, 2023 – January 31, 2024
Total Fees Sought:	\$81,816.80
Amount of retainer received in case:	N/A
Total professional fees covered by this statement:	\$102,271.00
Total professional hours covered by this statement:	211.5
Average hourly rate for professionals:	\$484

¹ The last four digits of the Debtor's federal tax identification number is 8853. The Debtor's service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.

Reimbursable expenses sought in this statement:	\$6,597.20
Payment requested:	
80% Fees	\$82,816.80
100% Expenses	\$ 6,597.20
Total:	\$89,414.00

Pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules of the United States Bankruptcy Court for the Southern District of Texas (the “Bankruptcy Local Rules”), the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals (the “Interim Compensation Order”), and the Order Authorizing the Employment and Retention of Berry Riddell LLC as Co-Counsel for the Official Committee of Tort Claimants as of November 21, 2023 [ECF No. 1293], the law firm of Berry Riddell LLC (“Berry Riddell”), as co-counsel to the Official Committee of Tort Claimants (the “Committee”) appointed in this chapter 11 case, hereby submits this First Monthly Fee Statement of Berry Riddell LLP for Compensation for Services Rendered and Reimbursement of Expenses as Co-Counsel to the Official Committee of Tort Claimants for the Period from November 21, 2023 to January 31, 2024 (the “First Monthly Fee Statement”). By the First Fee Statement and pursuant to the Interim Compensation Order, Berry Riddell seeks interim payment of (i) \$82,816.80 (80% of \$102,271.00 as compensation for professional services rendered to the Committee and (ii) \$6,697.20 for reimbursement of actual and necessary expenses, for a total of \$89,414.00 for the period November 21, 2023 through and including January 31, 2024 (the “Fee Period”). Pursuant to the Interim Compensation Order, the Application Recipients have until 4:00 p.m. (CT) on the fourteenth day following service of this First Fee Statement to object to the requested fees and expenses.

Itemization of Services Rendered and Expenses Incurred

1. In support of this First Fee Statement, attached are the following exhibits:

Exhibit A is a schedule of the number of hours expended and fees incurred (on an aggregate basis) by Berry Riddell partners, counsel, associates, consultants and paraprofessionals during the Fee Period with respect to each of the subject matter categories Berry Riddell established in accordance with its internal billing procedures. As reflected in Exhibit A, Berry Riddell incurred \$102,271 in fees during the Fee Period. Pursuant to this First Fee Statement, Berry Riddell seeks compensation in the amount of \$82,816.80 or 80% of such fees

Exhibit B is a schedule providing certain information regarding the Berry Riddell attorneys and paraprofessionals for whose work on this chapter 11 case compensation is sought in this First Monthly Fee Statement. Attorneys and paraprofessionals of Berry Riddell expended a total of 211.5 hours in connection with this chapter 11 case during the Fee Period.

Exhibit C is a schedule setting forth the amount sought with respect to each category of expenses for which reimbursement is sought in this First Fee Statement. This First Fee Statement seeks reimbursement of expenses in the aggregate total amount of \$6,597.20.

Exhibit D consists of Berry Riddell's detailed records of fees and expenses incurred during the Fee Period in rendering professional services to the Committee.

Representations

2. Although Berry Riddell has used its reasonable best efforts to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this First Fee Statement due to delays caused by accounting and processing during the Fee Period. Berry Riddell reserves the right to seek payment of such fees and expenses not included herein. Subsequent fee statements will be submitted in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules and the Interim Compensation Order.

WHEREFORE, Berry Riddell respectfully requests compensation and reimbursement of its expenses incurred during the Fee Period in the total amount of \$89,414.00 consisting of (i) \$82,816.80, which is 80% of the fees incurred by the Debtors for reasonable and necessary professional services rendered by Berry Riddell, and (ii) \$6,597.20, which is 100% of actual necessary costs and expenses incurred, in accordance with the procedures set forth in the Interim Compensation Order.

Dated: March 7, 2024
Scottsdale, AZ

Respectfully submitted,

BERRY RIDDELL LLC

/s/ Michael W. Zimmerman

Michael W. Zimmerman (*pro hac vice*)

Martin A. Aronson (*pro hac vice*)

Jeffrey D. Gross (*pro hac vice*)

6750 E. Camelback Road, Suite 100

Scottsdale, AZ 85251

Email: mz@berryriddell.com

ma@berryriddell.com

jd@berryriddell.com

CERTIFICATE OF SERVICE

I certify that on March 7, 2024, I caused a true and correct copy of the foregoing document to be served by the Court's CM/ECF notification system, which will send notice of electronic filing to all counsel of record.

/s/ Lynda Kogutkiewicz

EXHIBIT A

Summary of Hours Expended and Fees Incurred by Matter Category

Category	Compensation by Category					
	Employee	Base Hrs	Base Amount	Billed Hrs	Billed Amount	
Case Administration/Disbursements	Michael Zimmerman	26.7	\$ 13,350.00	26.7	\$ 13,350.00	
Asset Analysis and Recovery	Michael Zimmerman	23	\$ 11,500.00	23	\$ 11,500.00	
Meetings of and Communications with Committee/Creditors	Michael Zimmerman	46.1	\$ 23,050.00	46.1	\$ 23,050.00	
Meetings of and Communications with Co-Counsel	Michael Zimmerman	5.9	\$ 2,950.00	5.9	\$ 2,950.00	
Fee/Employment Applications	Michael Zimmerman	8.7	\$ 4,350.00	8.7	\$ 4,350.00	
Contested Matters/Litigation (General)	Michael Zimmerman	43.1	\$ 21,550.00	43	\$ 21,500.00	
	Jeffrey Gross	7.4	\$ 3,626.00	7.4	\$ 3,626.00	
		50.5	\$ 25,176.00	50.4	\$ 25,126.00	
Plan and Disclosure Statement	Michael Zimmerman	10.9	\$ 5,450.00	10.9	\$ 5,450.00	
	Jeffrey Gross	0.5	\$ 245.00	0.5	\$ 245.00	
		11.4	\$ 5,695.00	11.4	\$5,695	
Mediation/Settlement	Michael Zimmerman	17.7	\$ 8,850.00	17.6	\$ 8,800.00	
Court Attendance	Michael Zimmerman	8.1	\$ 4,050.00	8.1	\$ 4,050.00	
Non-Working Travel @50%	Michael Zimmerman	13.6	\$ 3,400.00	13.6	\$ 3,400.00	
		211.7	\$ 102,371.00	211.5	\$ 102,271.00	

EXHIBIT B

Summary of Hours Expended and Fees Incurred by Professional

Compensation by Professional

Name of Attorney	Position; Admission Date	Hourly Billing Rate	Total Hours	Total Compensation
Michael Zimmerman	Partner; Admitted AZ 2009	\$ 500.00	190	\$ 95,000.00
		\$ 250.00	13.6	\$ 3,400.00
				\$ 98,400.00
Jeffrey Gross	Partner; Admitted AZ 1987	\$ 490.00	7.9	\$ 3,871.00
			211.5	\$ 102,271.00
Professional Blended Rate		\$495.00		

EXHIBIT C

Record of Expenses

Billed Disbursements

Date	Quantity	Description	Rate (\$)	Billable (\$)
11/29/2023	1	Court Fee for Michael W. Zimmerman to appear Pro Hac Vice in the Tehum Care Services, Inc. Bankruptcy case;	\$ 100.00	\$ 100.00
11/29/2023	1	Court Fee for Jeffrey D. Gross to appear Pro Hac Vice in the Tehum Care Services, Inc. Bankruptcy case;	\$ 100.00	\$ 100.00
11/29/2023	1	Court Fee for Martin A. Aronson to appear Pro Hac Vice in the Tehum Care Services, Inc. Bankruptcy case;	\$ 100.00	\$ 100.00
12/3/2023	1	Expenses for flight to and from New York, NY for M. Zimmerman to attend mediation in Committee for Tort Claimants;	\$ 743.80	\$ 743.80
12/13/2023	1	Expenses for taxi in New York, NY for M. Zimmerman to attend mediation in Committee for Tort Claimants;	\$ 98.50	\$ 98.50
12/15/2023	1	Expenses for hotel in New York, NY for M. Zimmerman to attend mediation in Committee for Tort Claimants;	\$ 981.46	\$ 981.46
12/15/2023	1	Expenses for Uber in New York, NY for M. Zimmerman to attend mediation in Committee for Tort Claimants;	\$ 19.98	\$ 19.98
12/15/2023	1	Expenses for taxi in New York, NY for M. Zimmerman to attend Committee of Tort Claimants mediation;	\$ 33.15	\$ 33.15
1/17/2024	1	Federal Express delivery of sealed motion to dismiss to Court;	\$ 198.59	\$ 198.59
1/18/2024	30024	Copies	\$0.10	\$ 3,002.40
1/18/2024	108	Postage	\$9.65	\$ 1,042.20
1/30/2024	1080	Copies	\$0.10	\$ 108.00
1/30/2024	108	Postage	\$0.64	\$ 69.12
				<u>\$ 6,597.20</u>

EXHIBIT D

Detailed Record of Time Entries

BERRY | RIDDELL LLC

6750 E. Camelback Road, Suite 100
Scottsdale, AZ 85251
United States
Phone: 480-385-2727

INVOICE

Invoice # 7459
Date: 02/01/2024
Due Upon Receipt

Committee of Tort Claimants

Committee of Tort Claimants/Tehum Care Services, Inc.

Services

Date	Timekeeper	Notes	Quantity	Rate	Total
01/02/2024	MWZ	Attend Tort Claimants' Committee member meeting;	0.80	\$500.00	\$400.00
01/02/2024	MWZ	Follow-up emails with TCC member re: coordinating upcoming meetings;	0.20	\$500.00	\$100.00
01/03/2024	MWZ	Emails with TCC members and their counsel re: approval of the motion to dismiss;	0.30	\$500.00	\$150.00
01/03/2024	MWZ	Emails to TCC members coordinating meeting;	0.20	\$500.00	\$100.00
01/03/2024	MWZ	Telephone conference with tort claimant re: case status and her pending motion to lift stay;	1.00	\$500.00	\$500.00
01/04/2024	MWZ	Emails to counsel for the TCC re: rescheduling meeting;	0.20	\$500.00	\$100.00
01/04/2024	MWZ	Analyze Debtor's Second Amended Plan;	0.40	\$500.00	\$200.00
01/04/2024	MWZ	Review case docket and papers related to hearing set for tort claimant's motion to lift stay set for January 16, 2024;	0.40	\$500.00	\$200.00
01/05/2024	MWZ	Meeting with counsel for the TCC Members re: motion to dismiss and case status;	1.10	\$500.00	\$550.00
01/05/2024	MWZ	Follow-up telephone call with counsel for TCC member re: case status;	0.50	\$500.00	\$250.00
01/05/2024	MWZ	Telephone call with tort claimant re: case status;	0.50	\$500.00	\$250.00
01/05/2024	MWZ	Review and respond to email from H. Nguyen re: status update;	0.20	\$500.00	\$100.00
01/05/2024	MWZ	Emails with counsel for TCC member re: case status;	0.20	\$500.00	\$100.00
01/08/2024	MWZ	Attend meeting with H. Nguyen, A. Jimenez and E. Goodman re: case status update;	0.80	\$500.00	\$400.00
01/08/2024	MWZ	Work on issues re: motion to dismiss;	0.50	\$500.00	\$250.00
01/08/2024	MWZ	Telephone call with counsel for TCC members re: motion to dismiss;	0.20	\$500.00	\$100.00
01/08/2024	MWZ	Review Debtor's motion to extend exclusivity;	0.20	\$500.00	\$100.00
01/08/2024	MWZ	Email Corrections Officer re: tort claimant's call;	0.20	\$500.00	\$100.00
01/08/2024	MWZ	Emails with TCC re: Debtor's motion to extend exclusivity;	0.30	\$500.00	\$150.00
01/08/2024	MWZ	Telephone call with counsel for TCC members re: Tort Claimant's and Debtor's settlement offer;	0.90	\$500.00	\$450.00

01/09/2024	MWZ	Attend Tort Claimants' Committee meeting;	1.00	\$500.00	\$500.00
01/09/2024	MWZ	Emails re: revisions to motion to dismiss;	0.20	\$500.00	\$100.00
01/09/2024	MWZ	Telephone conference with counsel for a tort claimant;	0.20	\$500.00	\$100.00
01/09/2024	MWZ	Telephone conference with Creditor's counsel re: motion to extend exclusivity;	0.50	\$500.00	\$250.00
01/09/2024	MWZ	Review Idaho Department of Correction's objection to conditional approval of the disclosure statement;	0.30	\$500.00	\$150.00
01/09/2024	MWZ	Attend meeting with Province;	1.00	\$500.00	\$500.00
01/09/2024	MWZ	Email Tort Claimants' Committee re: signature blocks on the updated motion to dismiss;	0.30	\$500.00	\$150.00
01/10/2024	MWZ	Emails re: revisions to motion to dismiss;	0.30	\$500.00	\$150.00
01/10/2024	MWZ	Work on objection to motion to extend exclusivity;	0.30	\$500.00	\$150.00
01/10/2024	MWZ	Telephone conference with E. Goodman re: objection to extend exclusivity;	0.80	\$500.00	\$400.00
01/11/2024	MWZ	Work on application to retain Province as financial advisor;	1.10	\$500.00	\$550.00
01/11/2024	MWZ	Email Tort Claimants' Committee co-chairs requesting approval to file the application to retain Province;	0.20	\$500.00	\$100.00
01/11/2024	MWZ	Review Debtor's monthly operating report;	0.40	\$500.00	\$200.00
01/12/2024	MWZ	Review exhibit list filed by the Debtor in preparation for the hearing on the motion to lift the stay;	0.10	\$500.00	\$50.00
01/12/2024	MWZ	Review ro se tort claimant's motion to dismiss;	0.30	\$500.00	\$150.00
01/12/2024	MWZ	Work on revisions to motion to dismiss and discuss same with E. Goodman;	0.40	\$500.00	\$200.00
01/12/2024	MWZ	Finalize application to retain Province;	0.40	\$500.00	\$200.00
01/12/2024	MWZ	Emails with co-chairs of Tort Claimants' Committee re: filing application to retain Province;	0.20	\$500.00	\$100.00
01/15/2024	MWZ	Review exhibits re: motion to lift stay;	0.40	\$500.00	\$200.00
01/16/2024	MWZ	Telephone conference with tort claimant re: stipulation to lift stay;	0.20	\$500.00	\$100.00
01/16/2024	MWZ	Prepare for Committee meeting;	0.40	\$500.00	\$200.00
01/16/2024	MWZ	Attend Committee meeting;	0.80	\$500.00	\$400.00
01/16/2024	MWZ	Coordinate re: call with TCC and telephone conference;	0.30	\$500.00	\$150.00
01/16/2024	MWZ	Attend hearing on tort claimant's motion to lift stay;	0.80	\$500.00	\$400.00
01/16/2024	MWZ	Emails re: 9019 filing;	0.20	\$500.00	\$100.00
01/16/2024	MWZ	Finalize motion to dismiss before filing;	0.70	\$500.00	\$350.00
01/16/2024	MWZ	Finalize unredacted motion to dismiss;	0.60	\$500.00	\$300.00
01/16/2024	MWZ	Telephone conference with counsel for tort claimant re: hearing and case status;	0.20	\$500.00	\$100.00
01/16/2024	MWZ	Telephone conference with counsel for TCC members re: case status;	0.50	\$500.00	\$250.00
01/17/2024	MWZ	Work on issues re: settlement proposal before TCC was formed;	0.80	\$500.00	\$400.00
01/17/2024	MWZ	Review Debtor's motion to borrow;	0.30	\$500.00	\$150.00
01/17/2024	MWZ	Correspondence with counsel for tort claimants re: motion to dismiss;	2.60	\$500.00	\$1,300.00

01/17/2024	MWZ	Telephone conference with tort claimant re: case status;	0.20	\$500.00	\$100.00
01/17/2024	MWZ	Attend meeting with C. Moxley, E. Goodman and G. Cicero re: tort claims;	0.80	\$500.00	\$400.00
01/17/2024	MWZ	Analyze Debtor's rule 9019 motion;	0.80	\$500.00	\$400.00
01/17/2024	MWZ	Work on objection to Debtor's 9019 motion;	0.50	\$500.00	\$250.00
01/17/2024	MWZ	Work on discovery requests for the Debtor and UCC;	0.80	\$500.00	\$400.00
01/17/2024	MWZ	Email Tort Claimants' Committee re: 9019 and motion to dismiss;	0.30	\$500.00	\$150.00
01/18/2024	MWZ	Emails with A. Kaufman re: motion to dismiss filed under seal;	0.20	\$500.00	\$100.00
01/18/2024	MWZ	Work on requests for production for UCC and Debtor;	0.40	\$500.00	\$200.00
01/18/2024	MWZ	Telephone conference with counsel for tort claimant re: judgment and claim;	0.50	\$500.00	\$250.00
01/18/2024	MWZ	Work on objection to 9019 motion to approve settlement;	1.50	\$500.00	\$750.00
01/18/2024	MWZ	Work on discovery for UCC and Debtor, including requests for production, requests for admissions and interrogatories;	0.80	\$500.00	\$400.00
01/18/2024	MWZ	Review pro se tort claimant filing;	0.60	\$500.00	\$300.00
01/19/2024	MWZ	Meeting with M. Atkinson re: proposed settlement;	0.50	\$500.00	\$250.00
01/19/2024	MWZ	Begin work on motion to extend deadlines;	0.60	\$500.00	\$300.00
01/19/2024	MWZ	Telephone conference with counsel for public interest group re: case status;	1.00	\$500.00	\$500.00
01/22/2024	MWZ	Attend meeting in preparation for meet and confer with Debtor's counsel and counsel for the UCC re: discovery issues;	0.40	\$500.00	\$200.00
01/22/2024	MWZ	Work on objection to exclusivity;	0.30	\$500.00	\$150.00
01/22/2024	MWZ	Email Tort Claimants' Committee re: objection to exclusivity;	0.20	\$500.00	\$100.00
01/22/2024	MWZ	Attend meet and confer with opposing counsel re: discovery issues;	0.50	\$500.00	\$250.00
01/22/2024	MWZ	Review recent filings on the docket including pro se motions for appointment of counsel, and proposed settlement;	0.30	\$500.00	\$150.00
01/23/2024	MWZ	Attend meeting re: discovery issues and request for emergency relief to reschedule hearing;	1.00	\$500.00	\$500.00
01/23/2024	MWZ	Telephone conference with tort claimant and coordinating follow-up call;	0.20	\$500.00	\$100.00
01/23/2024	MWZ	Begin work on discovery requests served by the UCC;	0.80	\$500.00	\$400.00
01/23/2024	MWZ	Telephone conference with tort claimant re: case status and her tort claim;	0.80	\$500.00	\$400.00
01/23/2024	MWZ	Emails with counsel for a tort claimant re: motion to dismiss;	0.20	\$500.00	\$100.00
01/23/2024	MWZ	Emails re: proposed rescheduling of hearing on 9019 motion and emergency motion for scheduling order;	0.30	\$500.00	\$150.00
01/23/2024	MWZ	Review joinders to motion to dismiss;	0.20	\$500.00	\$100.00
01/23/2024	MWZ	Prepare certificate of no objections to employment application for Berry Riddell;	0.50	\$500.00	\$250.00
01/23/2024	MWZ	Prepare certificate of no objection to employment application for Brown Rudnick;	0.50	\$500.00	\$250.00
01/24/2024	MWZ	Review Debtor and UCC's response to emergency motion for status conference;	0.30	\$500.00	\$150.00
01/24/2024	MWZ	Work on reply in support of emergency motion requesting a status conference;	0.30	\$500.00	\$150.00

01/24/2024	MWZ	Telephone conference with counsel for tort claimant re: case status;	0.40	\$500.00	\$200.00
01/24/2024	MWZ	Telephone conference with counsel for the Creditor;	0.20	\$500.00	\$100.00
01/24/2024	MWZ	Telephone conference with counsel for public interest group re: motion to dismiss;	0.50	\$500.00	\$250.00
01/24/2024	MWZ	Finalize notice of no objections to employment applications for Berry Riddell and Brown Rudnick before filing;	0.20	\$500.00	\$100.00
01/24/2024	MWZ	Review Arizona Department of Corrections' joinder in request for status conference;	0.10	\$500.00	\$50.00
01/24/2024	MWZ	Work on correspondence re: continuing mediation;	0.30	\$500.00	\$150.00
01/24/2024	MWZ	Telephone conference with counsel for Creditor;	0.70	\$500.00	\$350.00
01/24/2024	MWZ	Telephone conference with counsel for tort claimant re: motion to dismiss;	0.40	\$500.00	\$200.00
01/24/2024	MWZ	Telephone conference with counsel for tort claimant re: case status and motion to dismiss;	0.50	\$500.00	\$250.00
01/25/2024	MWZ	Work on preparation for status conference requested in the TCC's emergency motion;	0.30	\$500.00	\$150.00
01/25/2024	MWZ	Review joinder filed by tort claimant and related exhibits re: I. Lefkowitz;	0.30	\$500.00	\$150.00
01/25/2024	MWZ	Telephone conference with tort claimant and inmate in Maricopa County re: case status;	0.50	\$500.00	\$250.00
01/25/2024	MWZ	Work on notice of no objection for retention of Province;	0.30	\$500.00	\$150.00
01/26/2024	MWZ	Work on objection to exclusivity motion;	0.30	\$500.00	\$150.00
01/26/2024	MWZ	Work on responses to discovery requests;	0.80	\$500.00	\$400.00
01/26/2024	MWZ	Work on research (factual) re: successorship and exhibits presented in Michigan cases;	3.60	\$500.00	\$1,800.00
01/26/2024	MWZ	Work on discovery responses;	1.20	\$500.00	\$600.00
01/26/2024	MWZ	Review pro se joinder filed by P. Al-Amin;	0.20	\$500.00	\$100.00
01/27/2024	MWZ	Work on preparation of the TCC's 30(b)(6) designee;	1.40	\$500.00	\$700.00
01/27/2024	MWZ	Emails with S. Griffiths re: 30(b)(6) designee;	0.20	\$500.00	\$100.00
01/27/2024	MWZ	Work on deposition preparation;	0.80	\$500.00	\$400.00
01/29/2024	MWZ	Emails with Tort Claimants' Committee re: filed statement and attend to related emails;	0.20	\$500.00	\$100.00
01/29/2024	MWZ	Finalize exclusivity objection before filing;	0.30	\$500.00	\$150.00
01/29/2024	MWZ	Telephone conference with counsel for TCC members re: discovery issues;	0.20	\$500.00	\$100.00
01/29/2024	MWZ	Telephone conference with S. Griffiths re: preparation for 30(b)(6) deposition;	1.00	\$500.00	\$500.00
01/29/2024	MWZ	Work on deposition issues with Brown Rudnick and correspondence re: same;	0.60	\$500.00	\$300.00
01/29/2024	MWZ	Work on email response to Debtor's counsel re: scheduling depositions;	0.20	\$500.00	\$100.00
01/29/2024	MWZ	Review pro se joinder to motion to dismiss filed by A. Tripathi;	0.40	\$500.00	\$200.00
01/29/2024	MWZ	Review T. Grissom's objection to extend exclusivity;	0.20	\$500.00	\$100.00
01/29/2024	MWZ	Review Arizona Department of Corrections objections to exclusivity;	0.20	\$500.00	\$100.00
01/30/2024	MWZ	Prepare for Tort Claimants' Committee call;	0.50	\$500.00	\$250.00

Invoice # 7459 - 02/01/2024

01/30/2024	MWZ	Email Tort Claimants' Committee members re: status hearing access information;	0.20	\$500.00	\$100.00
01/30/2024	MWZ	Telephone conference with counsel for TCC members re: status conference;	0.30	\$500.00	\$150.00
01/30/2024	MWZ	Finalize certificate of service re: motion to dismiss;	0.10	\$500.00	\$50.00
01/30/2024	MWZ	Finalize certificate of service re: emergency motion for status hearing (No Charge);	0.10	\$0.00	\$0.00
01/30/2024	MWZ	Work on preparation for status hearing re: notice to pro se incarcerated people;	0.90	\$500.00	\$450.00
01/30/2024	MWZ	Attend meeting with counsel for Creditor group and tort claimant;	1.00	\$500.00	\$500.00
01/30/2024	MWZ	Work on analysis of UCC's discovery requests;	1.40	\$500.00	\$700.00
01/30/2024	MWZ	Work on preparation for Tort Claimants' Committee 30(b)(6) deposition of S. Griffiths;	2.20	\$500.00	\$1,100.00
01/30/2024	MWZ	Work on preparation of notice issues for status conference;	1.30	\$500.00	\$650.00
01/31/2024	MWZ	Review email re: scheduling depositions and follow-up re: deposition of the Tort Claimants' Committee's 30(b)(6);	0.30	\$500.00	\$150.00
01/31/2024	MWZ	Continue working on preparation of the Tort Claimants' Committee's 30(b)(6) witness;	1.50	\$500.00	\$750.00
01/31/2024	MWZ	Review Debtor's statement of position in connection with status conference for January 31, 2024;	0.20	\$500.00	\$100.00
01/31/2024	MWZ	Attend status hearing;	1.00	\$500.00	\$500.00
01/31/2024	MWZ	Follow-up work on coordinating deposition dates;	0.60	\$500.00	\$300.00
01/31/2024	MWZ	Telephone conference with counsel for tort claimant re: depositions;	0.80	\$500.00	\$400.00
01/31/2024	MWZ	Telephone conference with counsel for TCC members re: Tort Claimants' Committee discovery issues and status conference;	0.30	\$500.00	\$150.00
				Services Subtotal	\$35,650.00

Expenses

Date	Notes	Quantity	Rate	Total
01/17/2024	Federal Express: Berry Riddell to United States District Court;	1.00	\$198.59	\$198.59
01/18/2024	Photocopies	30,024.00	\$0.10	\$3,002.40
01/18/2024	Postage	108.00	\$9.65	\$1,042.20
01/30/2024	Photocopies	1,080.00	\$0.10	\$108.00
01/30/2024	Postage	108.00	\$0.64	\$69.12
Expenses Subtotal				\$4,420.31
Subtotal				\$40,070.31
Total for Current Invoice				\$40,070.31

Detailed Statement of Account**Prior Invoices**

Invoice Number	Invoice Date	Amount Due	Payments Received	Balance Due
7457	12/01/2023	\$20,645.00	\$0.00	\$20,645.00
7458	01/01/2024	\$48,152.89	\$0.00	\$48,152.89

Current Invoice

Invoice Number	Invoice Date	Amount Due	Payments Received	Balance Due
7459	02/01/2024	\$40,070.31	\$0.00	\$40,070.31
Outstanding Balance				\$108,868.20
Total Amount Outstanding				\$108,868.20

Please make all amounts payable to: Berry Riddell LLC

Payment is due upon receipt.

BERRY | RIDDELL LLC

6750 E. Camelback Road, Suite 100
Scottsdale, AZ 85251
United States
Phone: 480-385-2727

INVOICE

Invoice # 7458
Date: 01/01/2024
Due Upon Receipt

Committee of Tort Claimants

Committee of Tort Claimants/Tehum Care Services, Inc.

Services

Date	Timekeeper	Notes	Quantity	Rate	Total
12/01/2023	MWZ	Review proofs of claims;	3.70	\$500.00	\$1,850.00
12/04/2023	MWZ	Review orders granting pro hac vice for Berry Riddell, LLC;	1.10	\$500.00	\$550.00
12/04/2023	MWZ	Work on agenda for Tort Claimant's Committee meeting;	0.30	\$500.00	\$150.00
12/04/2023	MWZ	Review and revise Debtor's proposed confidentiality order;	0.60	\$500.00	\$300.00
12/05/2023	MWZ	Review case docket and pro se objections to disclosure statement and plan;	0.20	\$500.00	\$100.00
12/05/2023	MWZ	Prepare for committee meeting;	0.30	\$500.00	\$150.00
12/05/2023	MWZ	Attend committee meeting;	1.30	\$500.00	\$650.00
12/05/2023	MWZ	Emails with Debtor's counsel, L. Webb, re: proposed confidentiality order;	0.20	\$500.00	\$100.00
12/05/2023	MWZ	Telephone call and emails with Judge Sontchi confirming mediation location and access for virtual attendance;	0.30	\$500.00	\$150.00
12/05/2023	MWZ	Review pro se objections filed by A. Dalal and B. Dryong;	0.20	\$500.00	\$100.00
12/05/2023	MWZ	Work on employment application and order;	1.60	\$500.00	\$800.00
12/06/2023	MWZ	Prepare for status hearing;	0.30	\$500.00	\$150.00
12/06/2023	MWZ	Review emails from and telephone call with counsel for incarcerated tort claimant re: TCC;	0.50	\$500.00	\$250.00
12/06/2023	MWZ	Attend status conference;	0.60	\$500.00	\$300.00
12/07/2023	MWZ	Telephone call with counsel for tort claimant re: 9019 settlement issues;	0.90	\$500.00	\$450.00
12/07/2023	MWZ	Telephone call with counsel for TCC members re: settlement issues;	1.00	\$500.00	\$500.00
12/07/2023	MWZ	Work on analysis of second amended plan and disclosure statement;	2.80	\$500.00	\$1,400.00
12/08/2023	MWZ	Telephone call with counsel for tort claimant re: tort claimant and insurance issues;	0.30	\$500.00	\$150.00
12/08/2023	MWZ	Review pro se filing re: injury claim and objection to disclosure settlement filed by M. Jessie;	0.20	\$500.00	\$100.00
12/08/2023	MWZ	Factual research re: Flacks Group;	0.80	\$500.00	\$400.00
12/08/2023	MWZ	Work on analysis of second amended disclosure statement;	3.40	\$500.00	\$1,700.00

12/08/2023	MWZ	Emails and telephone call with counsel for tort claimant;	0.30	\$500.00	\$150.00
12/08/2023	MWZ	Review motion to lift stay filed by tort claimant A. Tripathi;	0.20	\$500.00	\$100.00
12/08/2023	MWZ	Work on review of documents prepared by M2 Loan Co;	4.90	\$500.00	\$2,450.00
12/09/2023	MWZ	Continue working on review of documents provided by M2 Loan Co;	3.70	\$500.00	\$1,850.00
12/11/2023	MWZ	Review documents produced by Debtors counsel;	1.70	\$500.00	\$850.00
12/11/2023	MWZ	Telephone call with G. Cicero re: TCC meeting and case strategy;	0.50	\$500.00	\$250.00
12/12/2023	MWZ	Prepare for TCC meeting;	0.40	\$500.00	\$200.00
12/12/2023	MWZ	Attend meeting with Tort Claimant's Committee;	1.20	\$500.00	\$600.00
12/12/2023	MWZ	Follow-up email re: TCC members' invites for mediation;	0.30	\$500.00	\$150.00
12/12/2023	MWZ	Emails re: Michigan decisions re: Corizon;	0.20	\$500.00	\$100.00
12/12/2023	MWZ	Telephone call with chief pro se clerk for the District of Arizona;	0.50	\$500.00	\$250.00
12/12/2023	MWZ	Factual research re: Michigan lawsuit against YesCare;	0.80	\$500.00	\$400.00
12/12/2023	MWZ	Work on review of documents produced by M2 Loan Co.;	1.70	\$500.00	\$850.00
12/12/2023	MWZ	Emails with C. Sontchi re: mediation participants;	0.20	\$500.00	\$100.00
12/13/2023	MWZ	Participate in pre-settlement conference with Judge Sontchi;	0.80	\$500.00	\$400.00
12/13/2023	MWZ	Prepare for settlement conference;	2.40	\$500.00	\$1,200.00
12/13/2023	MWZ	Travel from Phoenix, AZ to New York, NY [50% of Rate];	6.80	\$250.00	\$1,700.00
12/14/2023	MWZ	Attend settlement conference with J. Sontchi, Debtor's counsel, unsecured Debtor's committee and DIP lender and meet with TCC members;	9.00	\$500.00	\$4,500.00
12/14/2023	MWZ	Work on settlement strategy;	1.20	\$500.00	\$600.00
12/15/2023	MWZ	Travel from New York, NY to Phoenix, AZ [50% of Rate];	6.80	\$250.00	\$1,700.00
12/17/2023	MWZ	Review pro se objection to disclosure statement filed by C. Bell;	0.20	\$500.00	\$100.00
12/17/2023	MWZ	Review pro se filing re: dismissal of bankruptcy case;	0.20	\$500.00	\$100.00
12/17/2023	MWZ	Review M. Chapman's pro se objection to disclosure statement;	0.20	\$500.00	\$100.00
12/17/2023	MWZ	Review T. Keeker pro se objection to disclosure statement;	0.20	\$500.00	\$100.00
12/17/2023	MWZ	Work on review of insurance issues;	1.70	\$500.00	\$850.00
12/18/2023	MWZ	Work on settlement strategy;	0.60	\$500.00	\$300.00
12/18/2023	MWZ	Prepare for status conference;	0.70	\$500.00	\$350.00
12/18/2023	MWZ	Attend status conference;	0.70	\$500.00	\$350.00
12/18/2023	MWZ	Work on employment application;	0.60	\$500.00	\$300.00
12/18/2023	MWZ	Work on declaration in support of the employment application;	0.60	\$500.00	\$300.00
12/18/2023	MWZ	Telephone call with tort claimant re: pro se claims;	0.50	\$500.00	\$250.00
12/18/2023	MWZ	Telephone call with M. Atkinson re: possible retention;	0.50	\$500.00	\$250.00
12/18/2023	MWZ	Telephone call with counsel for a Creditor re: case status;	0.50	\$500.00	\$250.00
12/18/2023	MWZ	Telephone call with counsel for TCC members re: Arizona insurance issues;	0.50	\$500.00	\$250.00
12/18/2023	MWZ	Email Tort Claimants' Committee re: hiring M. Atkinson;	0.30	\$500.00	\$150.00

12/19/2023	JDG	Work on motion to dismiss and discuss same;	3.70	\$490.00	\$1,813.00
12/19/2023	MWZ	Work on summary of claims asserted by members of the Tort Claimant's Committee;	6.70	\$500.00	\$3,350.00
12/19/2023	MWZ	Work on motion to dismiss;	0.70	\$500.00	\$350.00
12/19/2023	MWZ	Prepare for TCC committee meeting;	0.30	\$500.00	\$150.00
12/19/2023	MWZ	Attend TCC committee meeting;	1.00	\$500.00	\$500.00
12/20/2023	MWZ	Work on revisions to motion to dismiss;	3.90	\$500.00	\$1,950.00
12/20/2023	JDG	Work on motion to dismiss and discuss strategy re: same;	3.50	\$490.00	\$1,715.00
12/21/2023	JDG	Discuss motion to dismiss;	0.20	\$490.00	\$98.00
12/21/2023	MWZ	Work on revisions to application to employ Berry Riddell, declarations of Tort Claimants' Committee co-chairs and declaration of M. Zimmerman;	2.10	\$500.00	\$1,050.00
12/21/2023	MWZ	Emails to Tort Claimants' Committee re: application to employ Berry Riddell;	0.20	\$500.00	\$100.00
12/21/2023	MWZ	Review pro se filings;	0.30	\$500.00	\$150.00
12/21/2023	MWZ	Email Tort Claimants' Committee re: draft motion to dismiss;	0.30	\$500.00	\$150.00
12/22/2023	MWZ	Emails with M. Atkinson re: document productions;	0.20	\$500.00	\$100.00
12/22/2023	MWZ	Attend to issues re: employment application;	0.20	\$500.00	\$100.00
12/27/2023	MWZ	Work on issues re: motion to dismiss;	0.40	\$500.00	\$200.00
12/27/2023	MWZ	Emails with counsel for the Tort Claimants' Committee re: draft motion to dismiss;	0.30	\$500.00	\$150.00
12/27/2023	MWZ	Telephone conference with counsel for Tort Claimants' Committee member, re: draft motion for structured dismissal;	0.30	\$500.00	\$150.00
12/27/2023	MWZ	Review insurance claim information;	1.40	\$500.00	\$700.00
12/28/2023	MWZ	Follow-up re: emails re: Debtor's claims analysis;	0.30	\$500.00	\$150.00
12/28/2023	MWZ	Emails and telephone conferences with counsel for tort claimant re: tort claims and case status;	0.50	\$500.00	\$250.00
12/28/2023	MWZ	Work on analysis of documents provided by counsel for the UCC;	0.80	\$500.00	\$400.00
				Services Subtotal	\$46,276.00

Expenses

Date	Notes	Quantity	Rate	Total
12/03/2023	Expenses for flight to and from New York, NY for M. Zimmerman to attend mediation in Committee for Tort Claimants;	1.00	\$743.80	\$743.80
12/13/2023	Expenses for taxi in New York, NY for M. Zimmerman to attend mediation in Committee for Tort Claimants;	1.00	\$98.50	\$98.50
12/15/2023	Expenses for hotel in New York, NY for M. Zimmerman to attend mediation in Committee for Tort Claimants;	1.00	\$981.46	\$981.46
12/15/2023	Expenses for Uber in New York, NY for M. Zimmerman to attend mediation in Committee for Tort Claimants;	1.00	\$19.98	\$19.98
12/15/2023	Expenses for taxi in New York, NY for M. Zimmerman to attend Committee of Tort Claimants mediation;	1.00	\$33.15	\$33.15
Expenses Subtotal				\$1,876.89

Subtotal	\$48,152.89
Total for Current Invoice	\$48,152.89

Detailed Statement of Account**Prior Invoices**

Invoice Number	Invoice Date	Amount Due	Payments Received	Balance Due
7457	12/01/2023	\$20,645.00	\$0.00	\$20,645.00
7459	02/01/2024	\$40,070.31	\$0.00	\$40,070.31

Current Invoice

Invoice Number	Invoice Date	Amount Due	Payments Received	Balance Due
7458	01/01/2024	\$48,152.89	\$0.00	\$48,152.89
Outstanding Balance				\$108,868.20
Total Amount Outstanding				\$108,868.20

Please make all amounts payable to: Berry Riddell LLC

Payment is due upon receipt.

BERRY | RIDDELL LLC

6750 E. Camelback Road, Suite 100
Scottsdale, AZ 85251
United States
Phone: 480-385-2727

INVOICE

Invoice # 7457
Date: 12/01/2023
Due Upon Receipt

Committee of Tort Claimants

Committee of Tort Claimants/Tehum Care Services, Inc.

Services

Date	Timekeeper	Notes	Quantity	Rate	Total
11/21/2023	MWZ	Meet with Committee of Tort Claimants;	0.80	\$500.00	\$400.00
11/21/2023	MWZ	Follow-up telephone conference with counsel for members of Committee of Tort Claimants;	1.10	\$500.00	\$550.00
11/21/2023	MWZ	Telephone conference with E. Goodman re: co-counsel representation;	0.80	\$500.00	\$400.00
11/21/2023	MWZ	Telephone conferences with H. Nguyen re: mediation order and re: potential member of the Committee;	0.40	\$500.00	\$200.00
11/21/2023	MWZ	Emails with Committee members re: retaining E. Goodman;	0.20	\$500.00	\$100.00
11/22/2023	MWZ	Work on coordinating retention of co-counsel for the Committee;	2.30	\$500.00	\$1,150.00
11/22/2023	MWZ	Conference with counsel for TCC members re: Committee claims assessment issues;	0.80	\$500.00	\$400.00
11/22/2023	MWZ	Telephone conference with C. Sontchi re: mediation issues;	0.20	\$500.00	\$100.00
11/22/2023	MWZ	Telephone conference with E. Goodman re: coordinating as co-counsel;	0.30	\$500.00	\$150.00
11/22/2023	MWZ	Email committee re: rescheduled mediation;	0.20	\$500.00	\$100.00
11/22/2023	MWZ	Follow-up emails re: retaining co-counsel;	0.30	\$500.00	\$150.00
11/22/2023	MWZ	Telephone conference with counsel for tort claimant re: case background;	0.70	\$500.00	\$350.00
11/22/2023	MWZ	Telephone conference with counsel for TCC members re: retaining co-counsel;	0.50	\$500.00	\$250.00
11/22/2023	MWZ	Work on TCC issues with counsel for TCC members;	1.30	\$500.00	\$650.00
11/22/2023	MWZ	Emails with Committee members and counsel re: retaining co-counsel;	0.40	\$500.00	\$200.00
11/24/2023	MWZ	Telephone conference with G. Cicero re: coordinating call with opposing counsel;	0.20	\$500.00	\$100.00
11/24/2023	MWZ	Review case docket and pleadings;	2.60	\$500.00	\$1,300.00
11/25/2023	MWZ	Research (factual) re: Tehum Care Services, Inc.;	0.80	\$500.00	\$400.00
11/25/2023	MWZ	Review case docket and pleadings;	6.20	\$500.00	\$3,100.00
11/26/2023	MWZ	Email with G. Cicero re: caption and stipulation for amending;	0.10	\$500.00	\$50.00
11/26/2023	MWZ	Review proofs of claim and tort claimants' letters;	1.70	\$500.00	\$850.00

11/26/2023	MWZ	Review related adversary cases in Texas and Missouri;	1.20	\$500.00	\$600.00
11/26/2023	MWZ	Conference with E. Goodman re: meeting with opposing counsel;	0.80	\$500.00	\$400.00
11/26/2023	MWZ	Review objections to plan and disclosure statement;	1.30	\$500.00	\$650.00
11/27/2023	MWZ	Telephone conference with E. Goodman and D. Molton re: Interim DIP order;	0.40	\$500.00	\$200.00
11/27/2023	MWZ	Review proposed NDA from Debtor's counsel;	0.40	\$500.00	\$200.00
11/27/2023	MWZ	Conference with counsel for TCC members re: case background;	0.50	\$500.00	\$250.00
11/27/2023	MWZ	Continue working on case analysis;	1.20	\$500.00	\$600.00
11/27/2023	MWZ	Telephone conference with E. Goodman re: strategy for case analysis;	0.50	\$500.00	\$250.00
11/27/2023	MWZ	Prepare for TCC call;	0.80	\$500.00	\$400.00
11/27/2023	MWZ	Attend TCC meeting;	2.00	\$500.00	\$1,000.00
11/27/2023	MWZ	Work on revisions to proposed mediation order;	0.40	\$500.00	\$200.00
11/28/2023	MWZ	Analysis of Interim DIP Orders;	0.40	\$500.00	\$200.00
11/28/2023	MWZ	Begin research into ERC credit;	0.80	\$500.00	\$400.00
11/28/2023	MWZ	Telephone call with counsel for TCC members re: ERC credit;	0.50	\$500.00	\$250.00
11/28/2023	MWZ	Work on analysis of Debtor's estate and factual research re: YesCare;	0.80	\$500.00	\$400.00
11/28/2023	MWZ	Review Tehum bankruptcy docket in Western District of Missouri;	0.80	\$500.00	\$400.00
11/28/2023	MWZ	Telephone call with E. Goodman re: strategy re: mediation and Committee calls;	0.50	\$500.00	\$250.00
11/28/2023	MWZ	Review correspondence from counsel for tort claimant;	0.20	\$500.00	\$100.00
11/28/2023	MWZ	Emails with Debtor's counsel requesting notice extending disclosure statement deadline;	0.20	\$500.00	\$100.00
11/28/2023	MWZ	Work on revisions to notice of second mediation;	0.30	\$500.00	\$150.00
11/28/2023	MWZ	Emails re: notice of second mediation;	0.20	\$500.00	\$100.00
11/28/2023	MWZ	Review proofs of claim;	0.80	\$500.00	\$400.00
11/29/2023	MWZ	Telephone call with counsel for tort claimant re: pending tort claim;	0.30	\$500.00	\$150.00
11/29/2023	MWZ	Review and respond to emails re: deadline to object to disclosure statement from various tort claimants;	0.40	\$500.00	\$200.00
11/29/2023	MWZ	Review objection and reservation of rights filed by the UST;	0.20	\$500.00	\$100.00
11/29/2023	MWZ	Review email from counsel for tort claimants and related documents;	0.20	\$500.00	\$100.00
11/29/2023	MWZ	Review letters from pro se tort claimant re: tort claim;	0.20	\$500.00	\$100.00
11/29/2023	MWZ	Review order appointing Judge Sontchi as mediator; (No Charge)	0.10	\$0.00	\$0.00
11/30/2023	MWZ	Work on draft motion to dismiss and discuss same in the event necessary;	0.50	\$500.00	\$250.00
11/30/2023	JDG	Review objections to disclosure statement;	0.50	\$490.00	\$245.00
11/30/2023	MWZ	Work on outline of motion re: structured dismissal in the event necessary;	0.40	\$500.00	\$200.00
11/30/2023	MWZ	Work on emails re: coordinating committee meetings;	0.20	\$500.00	\$100.00
11/30/2023	MWZ	Review Arizona Department of Corrections objection to disclosure statement;	0.30	\$500.00	\$150.00
11/30/2023	MWZ	Review tort claimant's objections to second amendment disclosure	0.40	\$500.00	\$200.00

		statement and plan;			
11/30/2023	MWZ	Review T. Grissom's objection to the second amended disclosure statement;	0.20	\$500.00	\$100.00
				Services Subtotal	\$20,345.00

Expenses

Date	Notes	Quantity	Rate	Total
11/29/2023	Court Fee for Michael W. Zimmerman to appear Pro Hac Vice in the Tehum Care Services, Inc. Bankruptcy case;	1.00	\$100.00	\$100.00
11/29/2023	Court Fee for Jeffrey D. Gross to appear Pro Hac Vice in the Tehum Care Services, Inc. Bankruptcy case;	1.00	\$100.00	\$100.00
11/29/2023	Court Fee for Martin A. Aronson to appear Pro Hac Vice in the Tehum Care Services, Inc. Bankruptcy case;	1.00	\$100.00	\$100.00
Expenses Subtotal				\$300.00
Subtotal				\$20,645.00
Total for Current Invoice				\$20,645.00

Detailed Statement of Account**Prior Invoices**

Invoice Number	Invoice Date	Amount Due	Payments Received	Balance Due
7458	01/01/2024	\$48,152.89	\$0.00	\$48,152.89
7459	02/01/2024	\$40,070.31	\$0.00	\$40,070.31

Current Invoice

Invoice Number	Invoice Date	Amount Due	Payments Received	Balance Due
7457	12/01/2023	\$20,645.00	\$0.00	\$20,645.00
Outstanding Balance				\$108,868.20
Total Amount Outstanding				\$108,868.20

Please make all amounts payable to: Berry Riddell LLC

Payment is due upon receipt.

EXHIBIT B

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

TEHUM CARE SERVICES, INC.,¹

Debtor.

Chapter 11

Case No. 23-90086 (CML)

**SECOND FEE STATEMENT OF BERRY RIDDELL LLC FOR COMPENSATION FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS CO-COUNSEL
TO THE OFFICIAL COMMITTEE
OF TORT CLAIMANTS FOR THE PERIOD FROM FEBRUARY 1, 2024 THROUGH
FEBRUARY 29, 2024**

In accordance with the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals [ECF No. 357], each Application Recipient receiving notice of this monthly fee statement shall have until 4:00 p.m. (CT), 14 days after service of this monthly fee statement to object to the fees and expenses requested herein. Upon the expiration of such 14-day period, the Debtor is authorized and directed to pay 80% of the fees and 100% of the expenses requested in this monthly fee statement that are not subject to an objection.

Name of Professional:	Berry Riddell LLC
Authorized to Provide Professional Services to:	Official Committee of Tort Claimants
Date Order of Employment Signed:	January 24, 2024, as of November 21, 2023 [ECF No. 1293]
Time Period Covered:	February 1, 2024 through February 29, 2024
Total Fees Sought:	\$34,040.00
Amount of retainer received in case:	N/A
Total professional fees covered by this statement:	\$42,550.00
Total professional hours covered by this statement:	86.6
Average hourly rate for professionals:	\$491.34

¹ The last four digits of the Debtor's federal tax identification number is 8853. The Debtor's service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.

Reimbursable expenses sought in this statement:	\$1,358.58
Payment requested:	
80% Fees	\$34,040.00
100% Expenses	\$ 1,358.58
Total:	\$35,398.58

Pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules of the United States Bankruptcy Court for the Southern District of Texas (the “Bankruptcy Local Rules”), the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals (the “Interim Compensation Order”), and the Order Authorizing the Employment and Retention of Berry Riddell LLC as Co-Counsel for the Official Committee of Tort Claimants as of November 21, 2023 [ECF No. 1293], the law firm of Berry Riddell LLC (“Berry Riddell”), as co-counsel to the Official Committee of Tort Claimants (the “Committee”) appointed in this chapter 11 case, hereby submits this Second Monthly Fee Statement of Berry Riddell LLP for Compensation for Services Rendered and Reimbursement of Expenses as Co-Counsel to the Official Committee of Tort Claimants for the Period from February 1, 2024 through February 29, 2024 (the “Second Monthly Fee Statement”). By the Second Fee Statement and pursuant to the Interim Compensation Order, Berry Riddell seeks interim payment of (i) \$34,040.00 (80% of \$42,550.00 as compensation for professional services rendered to the Committee and (ii) \$1,358.58 for reimbursement of actual and necessary expenses, for a total of \$35,398.58 for the period February 1, 2024 through and including February 29, 2024 (the “Fee Period”). Pursuant to the Interim Compensation Order, the Application Recipients have until 4:00 p.m. (CT) on the fourteenth day following service of this Second Fee Statement to object to the requested fees and expenses.

Itemization of Services Rendered and Expenses Incurred

1. In support of this Second Fee Statement, attached are the following exhibits:

Exhibit A is a schedule of the number of hours expended and fees incurred (on an aggregate basis) by Berry Riddell partners, counsel, associates, consultants and paraprofessionals during the Fee Period with respect to each of the subject matter categories Berry Riddell established in accordance with its internal billing procedures. As reflected in Exhibit A, Berry Riddell incurred \$42,550.00 in fees during the Fee Period. Pursuant to this Second Fee Statement, Berry Riddell seeks compensation in the amount of \$34,040.00 or 80% of such fees

Exhibit B is a schedule providing certain information regarding the Berry Riddell attorneys and paraprofessionals for whose work on this chapter 11 case compensation is sought in this Second Monthly Fee Statement. Attorneys and paraprofessionals of Berry Riddell expended a total of 86.6 hours in connection with this chapter 11 case during the Fee Period.

Exhibit C is a schedule setting forth the amount sought with respect to each category of expenses for which reimbursement is sought in this Second Fee Statement. This Second Fee Statement seeks reimbursement of expenses in the aggregate total amount of \$1,358.58.

Exhibit D consists of Berry Riddell's detailed records of fees and expenses incurred during the Fee Period in rendering professional services to the Committee.

Representations

2. Although Berry Riddell has used its reasonable best efforts to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Second Fee Statement due to delays caused by accounting and processing during the Fee Period. Berry Riddell reserves the right to seek payment of such fees and expenses not included herein. Subsequent fee statements will be submitted in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules and the Interim Compensation Order.

WHEREFORE, Berry Riddell respectfully requests compensation and reimbursement of its expenses incurred during the Fee Period in the total amount of \$35,398.58 consisting of (i) \$34,040.00, which is 80% of the fees incurred by the Debtors for reasonable and necessary professional services rendered by Berry Riddell, and (ii) \$1,358.58, which is 100% of actual necessary costs and expenses incurred, in accordance with the procedures set forth in the Interim Compensation Order.

Dated: March 12, 2024
Scottsdale, AZ

Respectfully submitted,

BERRY RIDDELL LLC

/s/ Michael W. Zimmerman

Michael W. Zimmerman (*pro hac vice*)

Martin A. Aronson (*pro hac vice*)

Jeffrey D. Gross (*pro hac vice*)

6750 E. Camelback Road, Suite 100

Scottsdale, AZ 85251

Email: mz@berryriddell.com

ma@berryriddell.com

jg@berryriddell.com

CERTIFICATE OF SERVICE

I certify that on March 12, 2024, I caused a true and correct copy of the foregoing document to be served by the Court's CM/ECF notification system, which will send notice of electronic filing to all counsel of record.

/s/ Lynda Kogutkiewicz

EXHIBIT A

Summary of Hours Expended and Fees Incurred by Matter Category

Compensation by Category		Base Hrs	Base Amount	Billed Hrs	Billed Amount
Category	Employee				
Meetings of and Communications with Committee/Creditors	Michael Zimmerman	13.2	\$ 6,600.00	12.6	\$ 6,300.00
Meetings of and Communications with Co-Counsel	Michael Zimmerman	1.6	\$ 800.00	1.6	\$ 800.00
Fee/Employment Applications	Michael Zimmerman	3.8	\$ 1,900.00	3.8	\$ 1,900.00
Contested Matters/Litigation (General)	Michael Zimmerman	63.6	\$ 31,800.00	62.9	\$ 31,450.00
Plan and Disclosure Statement	Michael Zimmerman	1.7	\$ 850.00	1.7	\$ 850.00
Court Attendance	Michael Zimmerman	1	\$ 500.00	1	\$ 500.00
Non-Working Travel @50%	Michael Zimmerman	3	\$ 750.00	3	\$ 750.00
		87.9	\$ 43,200.00	86.6	\$ 42,550.00

EXHIBIT B

Summary of Hours Expended and Fees Incurred by Professional

Compensation by Professional

Name of Attorney	Position; Admission Date	Hourly Billing		Total Hours	Total Compensation	
			Rate			
Michael Zimmerman	Partner; Admitted AZ 2009	\$	500.00		83.6	\$ 41,800.00
		\$	250.00		3	\$ 750.00
					86.6	\$ 42,550.00

Professional Blended Rate \$491.34

EXHIBIT C

Record of Expenses

Billed Disbursements

Date	Quantity	Description	Rate (\$)	Billable (\$)
Expense	2/7/2024	Pacer fees to access and download pleadings for the Southern District of Texas Bankruptcy Court;	156.7	156.7
Expense	2/20/2024	Travel expense for M. Zimmerman flight to Houston Texas for hearing in the Southern District of Texas Bankruptcy Court;	663.97	663.97
Expense	2/20/2024	Travel expense for M. Zimmerman hotel in Houston Texas for hearing in the Southern District of Texas Bankruptcy Court;	459.46	459.46
Expense	2/29/2024	Uber charge for ride to Sky Harbor Airport;	22.14	22.14
Expense	2/29/2024	Cab fare for trip to Houston TX for hearing;	56.31	56.31
			<u>\$</u>	<u>1,358.58</u>

EXHIBIT D

Detailed Record of Time Entries

BERRY | RIDDELL LLC

6750 E. Camelback Road, Suite 100
Scottsdale, AZ 85251
United States
Phone: 480-385-2727

INVOICE

Invoice # 7551
Date: 03/01/2024
Due Upon Receipt

Committee of Tort Claimants

Committee of Tort Claimants/Tehum Care Services, Inc.

Services

Date	Timekeeper	Notes	Quantity	Rate	Total
02/01/2024	MWZ	Review correspondence from Senator E. Warren to the Office of the U.S. Trustee, and responses from YesCare and Tehum to Senators' letter;	0.80	\$500.00	\$400.00
02/01/2024	MWZ	Review and respond to emails re: scheduling meeting with the U.S. Trustee;	0.20	\$500.00	\$100.00
02/01/2024	MWZ	Telephone conference with public advocacy group;	0.50	\$500.00	\$250.00
02/01/2024	MWZ	Follow-up emails with counsel for TCC members re: coordinating 30(b)(6) deposition dates and discovery issues;	0.20	\$500.00	\$100.00
02/01/2024	MWZ	Attend meeting with opposing counsel re: scheduling depositions;	0.50	\$500.00	\$250.00
02/01/2024	MWZ	Continue working on discovery requests;	0.40	\$500.00	\$200.00
02/02/2024	MWZ	Attend TCC strategy meeting re: Debtor's supplemental disclosure;	0.40	\$500.00	\$200.00
02/02/2024	MWZ	Work on issues re: supplemental disclosure by the debtors;	0.50	\$500.00	\$250.00
02/02/2024	MWZ	Review the UCC's discovery responses;	0.40	\$500.00	\$200.00
02/02/2024	MWZ	Coordinate with counsel for TCC members re: discovery responses by the Tort Claimants' Committee;	0.30	\$500.00	\$150.00
02/02/2024	MWZ	Review emails re: discovery responses; (No Charge)	0.20	\$0.00	\$0.00
02/04/2024	MWZ	Review Debtor's responses to discovery requests;	0.40	\$500.00	\$200.00
02/04/2024	MWZ	Work on review of Debtor's new documents produced in response to Tort Claimants' Committee requests for production;	1.30	\$500.00	\$650.00
02/04/2024	MWZ	Email case status update to Tort Claimants' Committee members;	0.20	\$500.00	\$100.00
02/04/2024	MWZ	Review email correspondence from tort claimant;	0.10	\$500.00	\$50.00
02/04/2024	MWZ	Review emails with M. Heyward re: representation of I. Lefkowitz re: depositions;	0.20	\$500.00	\$100.00
02/05/2024	MWZ	Review email from N. Zluticky re: scheduling issues; (No Charge)	0.20	\$0.00	\$0.00
02/05/2024	MWZ	Telephone conference with creditor's counsel re: status conference and response deadline;	0.50	\$500.00	\$250.00
02/05/2024	MWZ	Work on issues re: supplemental disclosure of documents;	0.60	\$500.00	\$300.00
02/05/2024	MWZ	Work on analysis of supplemental document disclosure and deposition schedule;	0.50	\$500.00	\$250.00

02/05/2024	MWZ	Attend status conference;	0.50	\$500.00	\$250.00
02/05/2024	MWZ	Telephone conference with Tort Claimants' Committee representative re: status hearing and discovery issues;	0.40	\$500.00	\$200.00
02/05/2024	MWZ	Telephone conference with E. Goodman re: coordinating the deposition schedule;	0.30	\$500.00	\$150.00
02/05/2024	MWZ	Review debtor's motion to declare A. Tripathi a vexatious litigant; (No Charge)	0.30	\$0.00	\$0.00
02/05/2024	MWZ	Email Tort Claimants' Committee re: interim DIP motion;	0.20	\$500.00	\$100.00
02/05/2024	MWZ	Telephone conference with tort claimant re: trial date and YesCare information;	0.50	\$500.00	\$250.00
02/05/2024	MWZ	Review unsealed documents from the Missouri case;	1.80	\$500.00	\$900.00
02/05/2024	MWZ	Work on preparation for 30(b)(6) deposition of the Tort Claimants' Committee;	1.40	\$500.00	\$700.00
02/06/2024	MWZ	Prepare for Tort Claimants' Committee meeting;	0.50	\$500.00	\$250.00
02/06/2024	MWZ	Attend Tort Claimants' Committee meeting;	0.90	\$500.00	\$450.00
02/06/2024	MWZ	Review pro se tort claimants' joinders to the motion to dismiss;	0.30	\$500.00	\$150.00
02/06/2024	MWZ	Review affidavits of I. Lefkowitz in other cases to prepare for I. Lefkowitz deposition;	0.80	\$500.00	\$400.00
02/07/2024	MWZ	Finalize certificate of no objection for Province retention;	0.30	\$500.00	\$150.00
02/07/2024	MWZ	Review and respond to emails re: deposition schedule;	0.20	\$500.00	\$100.00
02/07/2024	MWZ	Emails to Tort Claimants' Committee members re: deposition of I. Lefkowitz;	0.20	\$500.00	\$100.00
02/08/2024	MWZ	Attend deposition of I. Lefkowitz;	6.00	\$500.00	\$3,000.00
02/08/2024	MWZ	Work on objection to the debtor's amended notice of 30(b)(6);	0.40	\$500.00	\$200.00
02/08/2024	MWZ	Work on preparation for 30(b)(6) deposition of Tort Claimants' Committee with counsel for TCC members;	2.00	\$500.00	\$1,000.00
02/08/2024	MWZ	Work on objections to UCC's amended 30(b)(6) of the Tort Claimants' Committee;	0.40	\$500.00	\$200.00
02/09/2024	MWZ	Begin work on objections to UCC's notice of 30(b)(6) deposition;	0.70	\$500.00	\$350.00
02/09/2024	MWZ	Work on case strategy with E. Goodman;	0.50	\$500.00	\$250.00
02/09/2024	MWZ	Work on fee application;	0.80	\$500.00	\$400.00
02/12/2024	MWZ	Prepare for Tort Claimants' Committee 30(b)(6) deposition;	1.00	\$500.00	\$500.00
02/12/2024	MWZ	Defend Rule 30(b)(6) deposition of Tort Claimants' Committee by Debtor and UCC;	8.50	\$500.00	\$4,250.00
02/13/2024	MWZ	Prepare for Tort Claimants' Committee meeting;	0.30	\$500.00	\$150.00
02/13/2024	MWZ	Attend Tort Claimants' Committee meeting;	1.00	\$500.00	\$500.00
02/13/2024	MWZ	Telephone conference with counsel for tort claimant re: case status;	0.50	\$500.00	\$250.00
02/13/2024	MWZ	Review recent filings on the docket, including pro se joinders to motion to dismiss;	0.40	\$500.00	\$200.00
02/14/2024	MWZ	Work on issues re: deposition of UCC and confer with co-counsel re: same and related meetings;	3.20	\$500.00	\$1,600.00
02/15/2024	MWZ	Work on review of pleadings filed before TCC formation;	0.80	\$500.00	\$400.00
02/15/2024	MWZ	Work on analysis of second amended disclosure statement and prepare	1.70	\$500.00	\$850.00

		questions for deposition of R. Perry;			
02/15/2024	MWZ	Meet with [REDACTED]; (No Charge)	0.40	\$0.00	\$0.00
02/16/2024	MWZ	Attend deposition of debtor's CRO, R. Perry;	4.20	\$500.00	\$2,100.00
02/16/2024	MWZ	Telephone conference with counsel for public advocate re: unsealed documents from W.D. of Missouri;	0.20	\$500.00	\$100.00
02/20/2024	MWZ	Work on objection to Rule 9019 motion;	1.10	\$500.00	\$550.00
02/20/2024	MWZ	Emails re: Tort Claimants' Committee members;	0.30	\$500.00	\$150.00
02/20/2024	MWZ	Prepare for Tort Claimants' Committee meeting;	0.30	\$500.00	\$150.00
02/20/2024	MWZ	Attend Tort Claimants' Committee meeting;	0.90	\$500.00	\$450.00
02/20/2024	MWZ	Review deposition transcript of UCC's 30(b)(6) designee;	0.70	\$500.00	\$350.00
02/20/2024	MWZ	Emails coordinating call with counsel for the UST;	0.20	\$500.00	\$100.00
02/20/2024	MWZ	Review declaration of B. Henn from FTI Capital Advisors;	0.30	\$500.00	\$150.00
02/21/2024	MWZ	Meeting with A. Jiminez and H. Nguyen re: case status;	0.50	\$500.00	\$250.00
02/21/2024	MWZ	Emails with S. Griffiths re: attendance at hearing on 9019 and motion to dismiss; (No Charge)	0.20	\$0.00	\$0.00
02/21/2024	MWZ	Work on strategy with co-counsel re: hearing on 9019 and motion to dismiss;	0.50	\$500.00	\$250.00
02/21/2024	MWZ	Telephone conference with counsel for Tort Claimants' Committee members;	0.30	\$500.00	\$150.00
02/21/2024	MWZ	Telephone conference with unsecured creditor's counsel re: motion to dismiss;	0.50	\$500.00	\$250.00
02/21/2024	MWZ	Telephone conference with counsel for TCC members re: hearing;	0.40	\$500.00	\$200.00
02/21/2024	MWZ	Work on revisions to the objection to Rule 9019 motion;	2.20	\$500.00	\$1,100.00
02/22/2024	MWZ	Work on preparation of exhibits for hearing on proposed settlement and motion to dismiss;	4.40	\$500.00	\$2,200.00
02/22/2024	MWZ	Attend to emails re: trial witnesses;	0.30	\$500.00	\$150.00
02/22/2024	MWZ	Telephone conference with tort claimant's counsel re: case status;	0.20	\$500.00	\$100.00
02/22/2024	MWZ	Telephone conference with creditor's counsel re: joinder to motion to dismiss;	0.40	\$500.00	\$200.00
02/22/2024	MWZ	Review pro se tort claimant's joinder to the motion to dismiss;	0.20	\$500.00	\$100.00
02/23/2024	MWZ	Emails coordinating deposition of re: YesCare's corporate representative;	0.20	\$500.00	\$100.00
02/23/2024	MWZ	Review St. Luke's joinder to the joint motion to approve settlement;	0.20	\$500.00	\$100.00
02/23/2024	MWZ	Review the UST's objection to the 9019 motion;	0.30	\$500.00	\$150.00
02/23/2024	MWZ	Review UST's motion to dismiss;	0.20	\$500.00	\$100.00
02/23/2024	MWZ	Review tort claimant's objection to 9019;	0.20	\$500.00	\$100.00
02/25/2024	MWZ	Review amicus filed by the ACLU, Public Justice and UC Berkley;	0.40	\$500.00	\$200.00
02/25/2024	MWZ	Review UCC's objection to the Tort Claimants' Committee motion to dismiss;	0.90	\$500.00	\$450.00
02/25/2024	MWZ	Review YesCare's objections to the Tort Claimants' Committee subpoena for documents and 30(b)(6) testimony;	0.20	\$500.00	\$100.00
02/26/2024	MWZ	Work on reply in support of motion to dismiss;	0.80	\$500.00	\$400.00
02/26/2024	MWZ	Review pro se filings opposing 9019 and supporting the TCC's motion to	0.40	\$500.00	\$200.00

		dismiss;			
02/26/2024	MWZ	Email Tort Claimants' Committee members re: reply in support of the motion to dismiss;	0.20	\$500.00	\$100.00
02/26/2024	MWZ	Review debtor's objection to P. Morgan's claim;	0.20	\$500.00	\$100.00
02/26/2024	MWZ	Review debtor's objection to E. Frederick's claim;	0.20	\$500.00	\$100.00
02/26/2024	MWZ	Work on fee application;	1.60	\$500.00	\$800.00
02/26/2024	MWZ	Telephone conference with counsel for TCC re: case status;	0.20	\$500.00	\$100.00
02/26/2024	MWZ	Prepare for TCC meeting;	0.40	\$500.00	\$200.00
02/27/2024	MWZ	Prepare for meeting with TCC members re: claims;	0.30	\$500.00	\$150.00
02/27/2024	MWZ	Attend meeting with TCC representatives re: case status,	0.70	\$500.00	\$350.00
02/27/2024	MWZ	Attend TCC meeting;	1.00	\$500.00	\$500.00
02/27/2024	MWZ	Work on review of revised motion in limine and related exhibits;	0.30	\$500.00	\$150.00
02/27/2024	MWZ	Confer with counsel for TCC re: hearing procedures for TCC members;	0.20	\$500.00	\$100.00
02/27/2024	MWZ	Work on proposed revisions to the 5th Interim DIP order;	0.20	\$500.00	\$100.00
02/27/2024	MWZ	Confer with G. Cicero re: case strategy and hearing preparation;	0.30	\$500.00	\$150.00
02/27/2024	MWZ	Work on fee application;	1.10	\$500.00	\$550.00
02/27/2024	MWZ	Telephone conference with counsel for public advocacy;	0.40	\$500.00	\$200.00
02/28/2024	MWZ	Review 30 (b)(6) deposition transcript of YesCare to prepare for hearing on 9019;	0.90	\$500.00	\$450.00
02/28/2024	MWZ	Review witness list filed by M2LoanCo.	0.20	\$500.00	\$100.00
02/28/2024	MWZ	Review M. Atkinson deposition transcript to prepare for hearing on 9019;	1.10	\$500.00	\$550.00
02/28/2024	MWZ	Review of debtor and UCC's list of witnesses and exhibits;	1.30	\$500.00	\$650.00
02/28/2024	MWZ	Telephone conference with counsel for TCC members re: coordinating additional meetings with TCC;	0.40	\$500.00	\$200.00
02/28/2024	MWZ	Review UST's list of witnesses and exhibits;	0.40	\$500.00	\$200.00
02/28/2024	MWZ	Work on issues re: trial exhibits;	1.20	\$500.00	\$600.00
02/28/2024	MWZ	Witness preparation meeting re: TCC;	1.00	\$500.00	\$500.00
02/29/2024	MWZ	Review response to motion in limine and declarations;	0.40	\$500.00	\$200.00
02/29/2024	MWZ	Work on witness preparation of TCC;	0.90	\$500.00	\$450.00
02/29/2024	MWZ	Travel from Phoenix to Houston, TX; (billed at 50%)	3.00	\$250.00	\$750.00
02/29/2024	MWZ	Work on review of exhibits disclosed for hearing on motion to approve settlement;	2.10	\$500.00	\$1,050.00
				Services Subtotal	\$42,550.00

Expenses

Date	Notes	Quantity	Rate	Total
02/07/2024	Pacer fees to access and download pleadings for the Southern District of Texas	1.00	\$156.70	\$156.70

Invoice # 7551 - 03/01/2024

Bankruptcy Court;

02/20/2024	Travel expense for M. Zimmerman flight to Houston, Texas for hearing in the Southern District of Texas Bankruptcy Court;	1.00	\$663.97	\$663.97
02/20/2024	Travel expense for M. Zimmerman hotel in Houston, Texas for hearing in the Southern District of Texas Bankruptcy Court;	1.00	\$459.46	\$459.46
02/29/2024	Uber charge for ride to Sky Harbor Airport;	1.00	\$22.14	\$22.14
02/29/2024	Cab fare for trip to Houston TX for hearing;	1.00	\$56.31	\$56.31
			Expenses Subtotal	\$1,358.58
			Subtotal	\$43,908.58
			Total for Current Invoice	\$43,908.58

Detailed Statement of Account**Prior Invoices**

Invoice Number	Invoice Date	Amount Due	Payments Received	Balance Due
7457	12/01/2023	\$20,645.00	\$0.00	\$20,645.00
7458	01/01/2024	\$48,152.89	\$0.00	\$48,152.89
7459	02/01/2024	\$40,070.31	\$0.00	\$40,070.31

Current Invoice

Invoice Number	Invoice Date	Amount Due	Payments Received	Balance Due
7551	03/01/2024	\$43,908.58	\$0.00	\$43,908.58
			Outstanding Balance	\$152,776.78
			Total Amount Outstanding	\$152,776.78

Please make all amounts payable to: Berry Riddell LLC

Payment is due upon receipt.

EXHIBIT C

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

TEHUM CARE SERVICES, INC.,¹

Debtor.

Chapter 11

Case No. 23-90086 (CML)

**THIRD FEE STATEMENT OF BERRY RIDDELL LLC FOR COMPENSATION FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS CO-COUNSEL
TO THE OFFICIAL COMMITTEE OF TORT CLAIMANTS FOR THE PERIOD
FROM MARCH 1, 2024 THROUGH MARCH 31, 2024**

In accordance with the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals [ECF No. 357], each Application Recipient receiving notice of this monthly fee statement shall have until 4:00 p.m. (CT), 14 days after service of this monthly fee statement to object to the fees and expenses requested herein. Upon the expiration of such 14-day period, the Debtor is authorized and directed to pay 80% of the fees and 100% of the expenses requested in this monthly fee statement that are not subject to an objection.

Name of Professional:	Berry Riddell LLC
Authorized to Provide Professional Services to:	Official Committee of Tort Claimants
Date Order of Employment Signed:	January 24, 2024, as of November 21, 2023 [ECF No. 1293]
Time Period Covered:	March 1, 2024 through March 31, 2024
Total Fees Sought:	\$38,320.00
Amount of retainer received in case:	N/A
Total professional fees covered by this statement:	\$47,900.00
Total professional hours covered by this statement:	109.8
Average hourly rate for professionals:	\$436.25
Reimbursable expenses sought in this statement:	\$5,658.68

¹ The last four digits of the Debtor's federal tax identification number is 8853. The Debtor's service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.

Payment requested:	
80% Fees	\$38,320.00
100% Expenses	\$ 5,658.68
Total:	\$43,978.68

Pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules of the United States Bankruptcy Court for the Southern District of Texas (the “Bankruptcy Local Rules”), the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals (the “Interim Compensation Order”), and the Order Authorizing the Employment and Retention of Berry Riddell LLC as Co-Counsel for the Official Committee of Tort Claimants as of November 21, 2023 [ECF No. 1293], the law firm of Berry Riddell LLC (“Berry Riddell”), as co-counsel to the Official Committee of Tort Claimants (the “Committee”) appointed in this chapter 11 case, hereby submits this Third Monthly Fee Statement of Berry Riddell LLP for Compensation for Services Rendered and Reimbursement of Expenses as Co-Counsel to the Official Committee of Tort Claimants for the Period from March 1, 2024 through March 31, 2024 (the “Third Monthly Fee Statement”). By the Third Fee Statement and pursuant to the Interim Compensation Order, Berry Riddell seeks interim payment of (i) \$38,320.00 (80% of \$47,900.00) as compensation for professional services rendered to the Committee, and (ii) \$5,658.68 for reimbursement of actual and necessary expenses, for a total of \$43,978.68 for the period March 1, 2024 through and including March 31, 2024 (the “Fee Period”). Pursuant to the Interim Compensation Order, the Application Recipients have until 4:00 p.m. (CT) on the fourteenth day following service of this Third Fee Statement to object to the requested fees and expenses.

Itemization of Services Rendered and Expenses Incurred

1. In support of this Third Fee Statement, attached are the following exhibits:

Exhibit A is a schedule of the number of hours expended and fees incurred (on an aggregate basis) by Berry Riddell partners, counsel, associates, consultants and paraprofessionals during the Fee Period with respect to each of the subject matter categories Berry Riddell established in accordance with its internal billing procedures. As reflected in Exhibit A, Berry Riddell incurred \$47,900 in fees during the Fee Period. Pursuant to this Third Fee Statement, Berry Riddell seeks compensation in the amount of \$38,320.00 or 80% of such fees

Exhibit B is a schedule providing certain information regarding the Berry Riddell attorneys and paraprofessionals for whose work on this chapter 11 case compensation is sought in this Third Monthly Fee Statement. Attorneys and paraprofessionals of Berry Riddell expended a total of 109.8 hours in connection with this chapter 11 case during the Fee Period.

Exhibit C is a schedule setting forth the amount sought with respect to each category of expenses for which reimbursement is sought in this Third Fee Statement. This Third Fee Statement seeks reimbursement of expenses in the aggregate total amount of \$5,658.68.

Exhibit D consists of Berry Riddell's detailed records of fees and expenses incurred during the Fee Period in rendering professional services to the Committee.

Representations

2. Although Berry Riddell has used its reasonable best efforts to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Third Fee Statement due to delays caused by accounting and processing during the Fee Period. Berry Riddell reserves the right to seek payment of such fees and expenses not included herein. Subsequent fee statements will be submitted in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules and the Interim Compensation Order.

WHEREFORE, Berry Riddell respectfully requests compensation and reimbursement of its expenses incurred during the Fee Period in the total amount of \$43,978.68 consisting of (i) \$38,320.00, which is 80% of the fees incurred by the Debtors for reasonable and necessary professional services rendered by Berry Riddell, and (ii) \$5,658.68, which is 100% of actual necessary costs and expenses incurred, in accordance with the procedures set forth in the Interim Compensation Order.

Dated: April 5, 2024
Scottsdale, AZ

Respectfully submitted,

BERRY RIDDELL LLC

/s/ Michael W. Zimmerman

Michael W. Zimmerman (*pro hac vice*)

Martin A. Aronson (*pro hac vice*)

Jeffrey D. Gross (*pro hac vice*)

6750 E. Camelback Road, Suite 100

Scottsdale, AZ 85251

Email: mz@berryriddell.com

ma@berryriddell.com

jg@berryriddell.com

CERTIFICATE OF SERVICE

I certify that on April 5, 2024, I caused a true and correct copy of the foregoing document to be served by the Court's CM/ECF notification system, which will send notice of electronic filing to all counsel of record.

/s/ Lynda Kogutkiewicz

EXHIBIT A

Summary of Hours Expended and Fees Incurred by Matter Category

Category	Compensation by Category			
	Employee	Base Hrs	Base Amount	Billed Hrs
Case Administration/Disbursements	Michael Zimmerman	0.9	\$450.00	0.9
Meetings of and Communications with Committee/Creditors	Michael Zimmerman	16.6	\$ 8,300.00	16.6
Meetings of and Communications with Co-Counsel	Michael Zimmerman	4.3	\$ 2,150.00	4.3
Fee/Employment Applications	Michael Zimmerman	3.7	\$ 1,850.00	3.6
Contested Matters/Litigation (General)	Michael Zimmerman	16.8	\$ 8,400.00	16.8
Mediation/Settlement	Michael Zimmerman	1.4	\$ 700.00	1.4
Court Attendance	Michael Zimmerman	38.2	\$ 19,100.00	38.2
Non-Working Travel @50%	Michael Zimmerman	28	\$ 7,000.00	28
		109.9	\$47,950.00	109.8
				\$ 47,900.00

EXHIBIT B

Summary of Hours Expended and Fees Incurred by Professional

Compensation by Professional

Name of Attorney	Position; Admission Date	Hourly Billing Rate	Total Hours	Total Compensation
Michael Zimmerman	Partner; Admitted AZ 2009	\$ 500.00	81.8	\$ 40,900.00
		\$ 250.00	28	\$ 7,000.00
			109.8	\$ 47,900.00

Professional Blended Rate

\$436.25

EXHIBIT C

Record of Expenses

			Billed Disbursements	
Date	Quantity	Description	Rate (\$)	Billable (\$)
3/1/2024	1	Hotel charge for trip to Houston, TX for hearing;	\$ 477.74	\$ 477.74
3/1/2024	1	Cab fare for trip to Houston, TX for hearing;	\$ 23.63	\$ 23.63
3/1/2024	1	Dining expense for trip to Houston, TX for hearing;	\$ 41.87	\$ 41.87
3/4/2024	1	Cab fare for trip to Houston, TX for hearing;	\$ 71.35	\$ 71.35
3/6/2024	1	Skyways Transportation for trip to Houston, TX for hearing;	\$ 100.00	\$ 100.00
3/6/2024	1	Cab fare for trip to Houston, TX for hearing;	\$ 23.39	\$ 23.39
3/7/2024	1	Flight from Phoenix to Houston for hearing on 3/24/24 - 3/28/24;	\$ 649.96	\$ 649.96
3/18/2024	1	U.S. Legal Support invoice 990076834 for the deposition transcript of S. Griffiths;	\$ 3,028.75	\$ 3,028.75
3/24/2024	1	Waymo expense for travel to Phoenix Sky Harbor Airport for trip to Houston, TX for hearing;	\$ 19.25	\$ 19.25
3/24/2024	1	Hotel expense for trip to Houston, TX - 3/24/24 to 3/28/24;	\$ 994.63	\$ 994.63
3/24/2024	1	Niwi Taxicab charge for trip to Houston, TX for hearing;	\$ 47.03	\$ 47.03
3/28/2024	1	Banks Auto and Transportation Services for trip to Houston, TX for hearing;	\$ 93.75	\$ 93.75
3/28/2024	1	Mayflower Cab fare for trip back from Houston, TX;	\$ 24.03	\$ 24.03
3/31/2024	1	Pacer expenses for March, 2024;	\$ 63.30	\$ 63.30
				<u>\$ 5,658.68</u>

EXHIBIT D

Detailed Record of Time Entries



6750 E. Camelback Road, Suite 100
Scottsdale, AZ 85251
United States
Phone: 480-385-2727

INVOICE

Invoice # 7793
Date: 04/01/2024
Due Upon Receipt

Committee of Tort Claimants

Committee of Tort Claimants/Tehum Care Services, Inc.

Services

Date	Timekeeper	Notes	Quantity	Rate	Total
03/01/2024	MWZ	Preparation for hearing on 9019 and motion to dismiss;	3.10	\$500.00	\$1,550.00
03/01/2024	MWZ	Attend hearing on 9019 and motion to dismiss;	6.60	\$500.00	\$3,300.00
03/01/2024	MWZ	Meet with Brown Rudnick team re: cross examination strategy;	0.90	\$500.00	\$450.00
03/01/2024	MWZ	Travel from Houston, TX to Phoenix, AZ (50% rate);	4.00	\$250.00	\$1,000.00
03/01/2024	MWZ	Telephone conferences with TCC members re: hearing status and strategy;	0.40	\$500.00	\$200.00
03/01/2024	MWZ	Emails with counsel for Tort Claimants;	0.30	\$500.00	\$150.00
03/03/2024	MWZ	Work on TCC's witness preparation;	0.80	\$500.00	\$400.00
03/03/2024	MWZ	Emails with TCC members re: coordinating meeting;	0.30	\$500.00	\$150.00
03/03/2024	MWZ	Conference with coordinating counsel re: hearing strategy;	0.40	\$500.00	\$200.00
03/04/2024	MWZ	Prepare for TCC meeting;	0.40	\$500.00	\$200.00
03/04/2024	MWZ	Attend TCC meeting;	1.30	\$500.00	\$650.00
03/04/2024	MWZ	Emails with TCC members;	0.30	\$500.00	\$150.00
03/04/2024	MWZ	Telephone conference with Tort Claimant re: hearing status;	0.20	\$500.00	\$100.00
03/04/2024	MWZ	Work on TCC's witness preparation;	1.40	\$500.00	\$700.00
03/04/2024	MWZ	Telephone conference with counsel for TCC members re: hearing status;	0.40	\$500.00	\$200.00
03/04/2024	MWZ	Travel from Phoenix, AZ to Houston, TX (50% rate);	6.00	\$250.00	\$1,500.00
03/05/2024	MWZ	Work on TCC's witness preparation;	1.00	\$500.00	\$500.00
03/05/2024	MWZ	Review debtor's proposed revised proposed settlement order;	0.80	\$500.00	\$400.00
03/05/2024	MWZ	Attend hearing re: 9019 and motion to dismiss;	6.50	\$500.00	\$3,250.00
03/05/2024	MWZ	Follow-up conference with Brown Rudnick team re:	0.80	\$500.00	\$400.00
03/06/2024	MWZ	Telephone conference with pro se Tort Claimant re: her support for motion to dismiss;	0.50	\$500.00	\$250.00
03/06/2024	MWZ	Telephone conference with counsel for TCC members re: hearing status and strategy and timing for continued hearing;	0.90	\$500.00	\$450.00

Invoice # 7793 - 04/01/2024

03/06/2024	MWZ	Emails with opposing and coordinating counsel re: remaining witnesses and coordinating remaining hearing dates;	0.30	\$500.00	\$150.00
03/06/2024	MWZ	Emails with counsel for Tort Claimant re: hearing status;	0.30	\$500.00	\$150.00
03/06/2024	MWZ	Travel from Houston, TX to Phoenix, AZ (50% Rate);	6.00	\$250.00	\$1,500.00
03/07/2024	MWZ	Emails with TCC members re: hearing status and continued hearing dates;	0.20	\$500.00	\$100.00
03/08/2024	MWZ	Work on analysis of the debtor's revisions to the proposed order approving settlement;	0.60	\$500.00	\$300.00
03/08/2024	MWZ	Emails to TCC members re: case status and scheduling TCC meeting;	0.50	\$500.00	\$250.00
03/08/2024	MWZ	Review Alabama contract with YesCare and related request for proposal;	0.80	\$500.00	\$400.00
03/08/2024	MWZ	Work on second fee application for Berry Riddell;	1.20	\$500.00	\$600.00
03/08/2024	MWZ	Emails re: second fee application for Berry Riddell (No Charge);	0.10	\$0.00	\$0.00
03/08/2024	MWZ	Meeting with counsel for TCC re: witness preparation;	1.20	\$500.00	\$600.00
03/11/2024	MWZ	Work on Berry Riddell's second fee application;	1.40	\$500.00	\$700.00
03/11/2024	MWZ	Emails with TCC members re: fee applications;	0.20	\$500.00	\$100.00
03/11/2024	MWZ	Prepare for TCC meeting;	0.60	\$500.00	\$300.00
03/12/2024	MWZ	Attend TCC Committee meeting;	1.30	\$500.00	\$650.00
03/12/2024	MWZ	Emails with counsel for the UST re: hearing status;	0.20	\$500.00	\$100.00
03/12/2024	MWZ	Emails with counsel for creditor re: continued hearing dates;	0.20	\$500.00	\$100.00
03/12/2024	MWZ	Telephone conference with counsel for creditor re: hearing status;	0.90	\$500.00	\$450.00
03/12/2024	MWZ	Telephone conference with counsel for TCC members;	0.50	\$500.00	\$250.00
03/12/2024	MWZ	Work on TCC's witness preparation;	2.70	\$500.00	\$1,350.00
03/12/2024	MWZ	Meet with S. Griffiths and C. Moxley to prepare for hearing;	1.00	\$500.00	\$500.00
03/13/2024	MWZ	Work on TCC claims issues;	0.30	\$500.00	\$150.00
03/22/2024	MWZ	Telephone conference with I counsel tort claimant re: motion to dismiss;	0.40	\$500.00	\$200.00
03/22/2024	MWZ	Telephone conference with counsel for members of the TCC re: case status;	0.20	\$500.00	\$100.00
03/22/2024	MWZ	Review docket re: pro se involuntary filing and case status;	0.30	\$500.00	\$150.00
03/22/2024	MWZ	Telephone conferences with counsel for TCC members re: claims issues;	0.40	\$500.00	\$200.00
03/22/2024	MWZ	Review letters from pro se parties ;	0.20	\$500.00	\$100.00
03/22/2024	MWZ	Telephone conference with tort claimant re: case status;	0.70	\$500.00	\$350.00
03/22/2024	MWZ	Work on revisions to motion to compel payment;	0.40	\$500.00	\$200.00
03/22/2024	MWZ	Correspondence with coordinating counsel re: strategy for witness preparation;	0.40	\$500.00	\$200.00
03/22/2024	MWZ	Email TCC re: draft motion to compel payment;	0.20	\$500.00	\$100.00
03/24/2024	MWZ	Travel from Phoenix to Houston;	6.00	\$250.00	\$1,500.00
03/24/2024	MWZ	Work on TCC's witness preparation;	3.00	\$500.00	\$1,500.00
03/24/2024	MWZ	Work on cross examination outline for R. Perry;	2.00	\$500.00	\$1,000.00
03/24/2024	MWZ	Work on cross examination outline for I. Lefkowitz;	1.00	\$500.00	\$500.00

Invoice # 7793 - 04/01/2024

03/24/2024	MWZ	Emails to TCC re: continued hearing and proposed motion to compel payment of estate professional fees;	0.20	\$500.00	\$100.00
03/25/2024	MWZ	Emails and telephone calls with TCC members and their counsel;	0.50	\$500.00	\$250.00
03/25/2024	MWZ	Attend continued hearing re: motion to approve settlement and motion to dismiss;	10.00	\$500.00	\$5,000.00
03/26/2024	MWZ	Prepare for TCC meeting;	0.40	\$500.00	\$200.00
03/26/2024	MWZ	Attend TCC meeting;	1.00	\$500.00	\$500.00
03/26/2024	MWZ	Work on revisions to the motion to compel payment of estate professional fees;	0.40	\$500.00	\$200.00
03/26/2024	MWZ	Conference with creditor's counsel re: hearing status and closings;	1.00	\$500.00	\$500.00
03/26/2024	MWZ	Work on preparation for D. Barton's continued cross examination;	1.60	\$500.00	\$800.00
03/26/2024	MWZ	Telephone calls with counsel for TCC members re: continued hearing status;	0.80	\$500.00	\$400.00
03/27/2024	MWZ	Work on cross-examination of D. Barton and M. Dundon;	1.00	\$500.00	\$500.00
03/27/2024	MWZ	Attend continued hearing re: motion to approve settlement and motion to dismiss;	12.00	\$500.00	\$6,000.00
03/27/2024	MWZ	Telephone calls with counsel for TCC members re: case status;	0.40	\$500.00	\$200.00
03/28/2024	MWZ	Travel from Houston to Phoenix;	6.00	\$250.00	\$1,500.00
03/28/2024	MWZ	Telephone conferences with counsel for the TCC re: hearing status;	0.40	\$500.00	\$200.00
03/28/2024	MWZ	Confer with coordinating counsel re: call with Debtor's counsel and discuss strategy;	0.30	\$500.00	\$150.00
03/28/2024	MWZ	Begin working on preparation for TCC meeting;	0.30	\$500.00	\$150.00
03/29/2024	MWZ	Research (factual) re: status of Missouri bankruptcy case;	0.60	\$500.00	\$300.00
Services Subtotal					\$47,900.00

Expenses

Date	Notes	Quantity	Rate	Total
03/01/2024	Hotel charge for trip to Houston, TX for hearing;	1.00	\$477.74	\$477.74
03/01/2024	Cab fare for trip to Houston, TX for hearing;	1.00	\$23.63	\$23.63
03/01/2024	Dining expense for trip to Houston, TX for hearing;	1.00	\$41.87	\$41.87
03/04/2024	Cab fare for trip to Houston, TX for hearing;	1.00	\$71.35	\$71.35
03/06/2024	Skyways Transportation for trip to Houston, TX for hearing;	1.00	\$100.00	\$100.00
03/06/2024	Cab fare for trip to Houston, TX for hearing;	1.00	\$23.39	\$23.39
03/07/2024	Flight from Phoenix to Houston for hearing on 3/24/24 - 3/28/24;	1.00	\$649.96	\$649.96
03/18/2024	U.S. Legal Support invoice 990076834 for the deposition transcript of S. Griffiths;	1.00	\$3,028.75	\$3,028.75
03/24/2024	Waymo expense for travel to Phoenix Sky Harbor Airport for trip to Houston, TX for hearing;	1.00	\$19.25	\$19.25
03/24/2024	Hotel expense for trip to Houston, TX - 3/24/24 to 3/28/24;	1.00	\$994.63	\$994.63
03/24/2024	Niyl Taxicab charge for trip to Houston, TX for hearing;	1.00	\$47.03	\$47.03
03/28/2024	Banks Auto and Transportation Services for trip to Houston, TX for hearing;	1.00	\$93.75	\$93.75

Invoice # 7793 - 04/01/2024

03/28/2024	Mayflower Cab fare for trip back from Houston, TX;	1.00	\$24.03	\$24.03
03/31/2024	Pacer expenses for March, 2024;	1.00	\$63.30	\$63.30
Expenses Subtotal				\$5,658.68
Subtotal				\$53,558.68
Total for Current Invoice				\$53,558.68

Detailed Statement of Account**Prior Invoices**

Invoice Number	Invoice Date	Amount Due	Payments Received	Balance Due
7457	12/01/2023	\$20,645.00	\$0.00	\$20,645.00
7458	01/01/2024	\$48,152.89	\$0.00	\$48,152.89
7459	02/01/2024	\$40,070.31	\$0.00	\$40,070.31
7551	03/01/2024	\$43,908.58	\$0.00	\$43,908.58

Current Invoice

Invoice Number	Invoice Date	Amount Due	Payments Received	Balance Due
7793	04/01/2024	\$53,558.68	\$0.00	\$53,558.68
Outstanding Balance				\$206,335.46
Total Amount Outstanding				\$206,335.46

Please make all amounts payable to: Berry Riddell LLC

Payment is due upon receipt.

EXHIBIT D

**APR10IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

TEHUM CARE SERVICES, INC.,¹

Debtor.

Chapter 11

Case No. 23-90086 (CML)

**FOURTH FEE STATEMENT OF BERRY RIDDELL LLC FOR COMPENSATION FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS CO-COUNSEL
TO THE OFFICIAL COMMITTEE OF TORT CLAIMANTS FOR THE PERIOD
FROM APRIL 1, 2024 THROUGH APRIL 30, 2024**

In accordance with the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals [ECF No. 357], each Application Recipient receiving notice of this monthly fee statement shall have until 4:00 p.m. (CT), 14 days after service of this monthly fee statement to object to the fees and expenses requested herein. Upon the expiration of such 14-day period, the Debtor is authorized and directed to pay 80% of the fees and 100% of the expenses requested in this monthly fee statement that are not subject to an objection.

Name of Professional:	Berry Riddell LLC
Authorized to Provide Professional Services to:	Official Committee of Tort Claimants
Date Order of Employment Signed:	January 24, 2024, as of November 21, 2023 [ECF No. 1293]
Time Period Covered:	April 1, 2024 through April 30, 2024
Total Fees Sought:	\$24,960.00
Amount of retainer received in case:	N/A
Total professional fees covered by this statement:	\$31,200.00
Total professional hours covered by this statement:	62.4
Average hourly rate for professionals:	\$500.00
Reimbursable expenses sought in this statement:	\$875.14

¹ The last four digits of the Debtor's federal tax identification number is 8853. The Debtor's service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.

Payment requested:	
80% Fees	\$24,960.00
100% Expenses	\$ 875.14
Total:	\$25,835.14

Pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules of the United States Bankruptcy Court for the Southern District of Texas (the “Bankruptcy Local Rules”), the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals (the “Interim Compensation Order”), and the Order Authorizing the Employment and Retention of Berry Riddell LLC as Co-Counsel for the Official Committee of Tort Claimants as of November 21, 2023 [ECF No. 1293], the law firm of Berry Riddell LLC (“Berry Riddell”), as co-counsel to the Official Committee of Tort Claimants (the “Committee”) appointed in this chapter 11 case, hereby submits this Fourth Monthly Fee Statement of Berry Riddell LLP for Compensation for Services Rendered and Reimbursement of Expenses as Co-Counsel to the Official Committee of Tort Claimants for the Period from April 1, 2024 through April 30, 2024 (the “Fourth Monthly Fee Statement”). By the Fourth Fee Statement and pursuant to the Interim Compensation Order, Berry Riddell seeks interim payment of (i) \$24,960.00 (80% of \$31,200.00) as compensation for professional services rendered to the Committee, and (ii) \$875.14 for reimbursement of actual and necessary expenses, for a total of \$25,835.14 for the period April 1, 2024 through and including April 30, 2024 (the “Fee Period”). Pursuant to the Interim Compensation Order, the Application Recipients have until 4:00 p.m. (CT) on the fourteenth day following service of this Fourth Fee Statement to object to the requested fees and expenses.

Itemization of Services Rendered and Expenses Incurred

1. In support of this Fourth Fee Statement, attached are the following exhibits:

Exhibit A is a schedule of the number of hours expended and fees incurred (on an aggregate basis) by Berry Riddell partners, counsel, associates, consultants and paraprofessionals during the Fee Period with respect to each of the subject matter categories Berry Riddell established in accordance with its internal billing procedures. As reflected in Exhibit A, Berry Riddell incurred \$31,200.00 in fees during the Fee Period. Pursuant to this Fourth Fee Statement, Berry Riddell seeks compensation in the amount of \$24,960.00 or 80% of such fees

Exhibit B is a schedule providing certain information regarding the Berry Riddell attorneys and paraprofessionals for whose work on this chapter 11 case compensation is sought in this Fourth Monthly Fee Statement. Attorneys and paraprofessionals of Berry Riddell expended a total of 62.4 hours in connection with this chapter 11 case during the Fee Period.

Exhibit C is a schedule setting forth the amount sought with respect to each category of expenses for which reimbursement is sought in this Fourth Fee Statement. This Fourth Fee Statement seeks reimbursement of expenses in the aggregate total amount of \$875.14.

Exhibit D consists of Berry Riddell's detailed records of fees and expenses incurred during the Fee Period in rendering professional services to the Committee.

Representations

2. Although Berry Riddell has used its reasonable best efforts to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Fourth Fee Statement due to delays caused by accounting and processing during the Fee Period. Berry Riddell reserves the right to seek payment of such fees and expenses not included herein. Subsequent fee statements will be submitted in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules and the Interim Compensation Order.

WHEREFORE, Berry Riddell respectfully requests compensation and reimbursement of its expenses incurred during the Fee Period in the total amount of \$25,835.14 consisting of (i) \$24,960, which is 80% of the fees incurred by the Debtors for reasonable and necessary professional services rendered by Berry Riddell, and (ii) \$875.14, which is 100% of actual necessary costs and expenses incurred, in accordance with the procedures set forth in the Interim Compensation Order.

Dated: May 14, 2024
Scottsdale, AZ

Respectfully submitted,

BERRY RIDDELL LLC

/s/ Michael W. Zimmerman

Michael W. Zimmerman (*pro hac vice*)

Martin A. Aronson (*pro hac vice*)

Jeffrey D. Gross (*pro hac vice*)

6750 E. Camelback Road, Suite 100

Scottsdale, AZ 85251

Email: mz@berryriddell.com

ma@berryriddell.com

jg@berryriddell.com

CERTIFICATE OF SERVICE

I certify that on May 14, 2024, I caused a true and correct copy of the foregoing document to be served by the Court's CM/ECF notification system, which will send notice of electronic filing to all counsel of record.

/s/ Lynda Kogutkiewicz

EXHIBIT A

Summary of Hours Expended and Fees Incurred by Matter Category

Category	Compensation by Category		Base Hrs	Base Amount	Billed Hrs	Billed Amount
	Employee					
Case Administration/Disbursements	Michael Zimmerman		0	\$ -	0	\$ -
Meetings of and Communications with Committee/Creditors	Michael Zimmerman		29.5	\$ 14,750.00	29.5	\$ 14,750.00
Meetings of and Communications with Co-Counsel	Michael Zimmerman		6.5	\$ 3,250.00	6.5	\$ 3,250.00
Fee/Employment Applications	Michael Zimmerman		6.3	\$ 3,150.00	6.3	\$ 3,150.00
Contested Matters/Litigation (General)	Michael Zimmerman		15.8	\$ 7,900.00	15.8	\$ 7,900.00
Mediation/Settlement	Michael Zimmerman		3.3	\$ 1,650.00	3.3	\$ 1,650.00
Court Attendance	Michael Zimmerman		1	\$ 500.00	1	\$ 500.00
Non-Working Travel @50%	Michael Zimmerman		0	\$ -	0	\$ -
			62.4	\$31,200.00	62.4	\$ 31,200.00

EXHIBIT B

Summary of Hours Expended and Fees Incurred by Professional

Compensation by Professional

Name of Attorney	Position; Admission Date	Hourly Billing Rate	Total Hours	Total Compensation
Michael Zimmerman	Partner; Admitted AZ 2009	\$ 500.00	62.4	\$ 31,200.00
Professional Blended Rate		\$500.00		

EXHIBIT C

Record of Expenses

Billed Disbursements					
Description				Rate (\$)	Billable (\$)
Date	Quantity				
4/11/2024	1	Postage		\$ 0.88	\$ 0.88
4/16/2024	1	Airfare to/from Phoenix/New York for mediation;		\$ 781.46	\$ 781.46
4/25/2024	40	Postage		\$ 1.12	\$ 44.80
4/25/2024	480	Photocopies		\$ 0.10	\$ 48.00
					\$ 875.14

EXHIBIT D

Detailed Record of Time Entries

BERRY | RIDDELL LLC

6750 E. Camelback Road, Suite 100
Scottsdale, AZ 85251
Phone: 480-385-2727

INVOICE

Invoice # 7974
Date: 05/01/2024
Due Upon Receipt

Committee of Tort Claimants

Committee of Tort Claimants/Tehum Care Services, Inc.

Services

Date	Timekeeper	Notes	Quantity	Rate	Total
04/01/2024	MWZ	Telephone conference with pro se tort claimant re: case status;	0.90	\$500.00	\$450.00
04/01/2024	MWZ	Begin work on March fee application;	1.00	\$500.00	\$500.00
04/01/2024	MWZ	Work on preparation for TCC meeting;	0.40	\$500.00	\$200.00
04/01/2024	MWZ	Email TCC re: Province's proposed second fee application;	0.20	\$500.00	\$100.00
04/02/2024	MWZ	Attend TCC committee meeting;	1.50	\$500.00	\$750.00
04/02/2024	MWZ	Telephone conference with counsel for TCC members re: case status, hearing and strategy;	0.50	\$500.00	\$250.00
04/03/2024	MWZ	Confer with E. Goodman re: potential appeal issues;	0.30	\$500.00	\$150.00
04/03/2024	MWZ	Email re: coordinating a meeting;	0.20	\$500.00	\$100.00
04/03/2024	MWZ	Work on fee application;	0.60	\$500.00	\$300.00
04/03/2024	MWZ	Review pro se letters;	0.20	\$500.00	\$100.00
04/03/2024	MWZ	Telephone conference with counsel for TCC members re: case status and strategy for next steps;	0.90	\$500.00	\$450.00
04/04/2024	MWZ	Prepare for meeting with counsel for the UST;	0.20	\$500.00	\$100.00
04/04/2024	MWZ	Meet with counsel for the UST;	0.50	\$500.00	\$250.00
04/04/2024	MWZ	Work on fee application;	1.20	\$500.00	\$600.00
04/04/2024	MWZ	Email TCC members re: proposed fee application;	0.20	\$500.00	\$100.00
04/04/2024	MWZ	Research re: possible appeal of TCC's motion to dismiss;	0.80	\$500.00	\$400.00
04/04/2024	MWZ	Review pro se motion to allow late filed claim;	0.20	\$500.00	\$100.00
04/05/2024	MWZ	Review and respond to emails from TCC members re: filing Berry Riddell's third fee application;	0.20	\$500.00	\$100.00
04/05/2024	MWZ	Telephone conference with mother of incarcerated pro se claimant;	0.80	\$500.00	\$400.00
04/05/2024	MWZ	Emails with coordinating counsel re: telephone conference with pro se inmate's mother;	0.20	\$500.00	\$100.00
04/05/2024	MWZ	Review Debtor's motion to amend and revised order;	0.30	\$500.00	\$150.00
04/05/2024	MWZ	Telephone conference with counsel for the TCC members re: case status and planning for upcoming meeting;	0.50	\$500.00	\$250.00

04/05/2024	MWZ	Telephone conference with coordinating counsel re: Debtor's motion to amend and revise interim compensation order;	0.40	\$500.00	\$200.00
04/08/2024	MWZ	Work on revisions to the response to Debtor's motion to amend proposed DIP order;	0.90	\$500.00	\$450.00
04/08/2024	MWZ	Email TCC members re: proposed response to Debtor's motion to amend proposed DIP order;	0.20	\$500.00	\$100.00
04/08/2024	MWZ	Prepare for TCC meeting;	0.40	\$500.00	\$200.00
04/08/2024	MWZ	Telephone conference with counsel for public interest groups re: case status;	0.40	\$500.00	\$200.00
04/08/2024	MWZ	Telephone conference with coordinating counsel, E. Goodman, re: Debtor's proposed amendment to interim compensation order and TCC meeting;	0.40	\$500.00	\$200.00
04/09/2024	MWZ	Follow-up with counsel for public interest groups;	0.30	\$500.00	\$150.00
04/09/2024	MWZ	Attend TCC meeting;	0.90	\$500.00	\$450.00
04/09/2024	MWZ	Emails with TCC members re: objection to Debtor's proposed amendment to the interim DIP order;	0.80	\$500.00	\$400.00
04/09/2024	MWZ	Finalize objection to motion to amend interim compensation order;	1.30	\$500.00	\$650.00
04/09/2024	MWZ	Telephone conference with counsel for TCC members re: pro se issues;	0.40	\$500.00	\$200.00
04/09/2024	MWZ	Emails and telephone conference with E. Goodman re: objection to amended interim compensation order and finalize same;	0.40	\$500.00	\$200.00
04/09/2024	MWZ	Emails with counsel for public interest group and pro se claimant re: virtual oral ruling;	0.30	\$500.00	\$150.00
04/10/2024	MWZ	Review tort claimant's joinder to the motion to dismiss;	0.20	\$500.00	\$100.00
04/10/2024	MWZ	Emails with counsel for public interest group re: coordinating a call;	0.20	\$500.00	\$100.00
04/10/2024	MWZ	Emails with counsel for tort claimant re: hearing date and time;	0.20	\$500.00	\$100.00
04/11/2024	MWZ	Telephone conference with pro se inmate from Tipton Corrections;	0.60	\$500.00	\$300.00
04/11/2024	MWZ	Appear at hearing re: Judge Lopez's delivery of opinion on 9019 and motion to dismiss;	1.00	\$500.00	\$500.00
04/11/2024	MWZ	Confer with coordinating counsel re: ruling;	1.00	\$500.00	\$500.00
04/11/2024	MWZ	Telephone conference with pro se tort claimant re: case status;	0.60	\$500.00	\$300.00
04/11/2024	MWZ	Work on letter to pro se claimant, providing a proof of claim form;	0.20	\$500.00	\$100.00
04/11/2024	MWZ	Email hearing transcripts to pro se tort claimant ;	0.20	\$500.00	\$100.00
04/11/2024	MWZ	Telephone conference with counsel for TCC members;	0.50	\$500.00	\$250.00
04/11/2024	MWZ	Email TCC members re: Judge Lopez decision and coordinating meeting;	0.20	\$500.00	\$100.00
04/11/2024	MWZ	Work on analysis of Judge Lopez's decision;	0.50	\$500.00	\$250.00
04/11/2024	MWZ	Telephone conference with coordinating counsel re: possible appeal issues;	0.40	\$500.00	\$200.00
04/12/2024	MWZ	Prepare for TCC meeting;	0.40	\$500.00	\$200.00
04/12/2024	MWZ	Attend TCC meeting;	1.00	\$500.00	\$500.00
04/12/2024	MWZ	Telephone conference with counsel for TCC members re: next steps for possible plan and further settlement negotiations;	0.50	\$500.00	\$250.00
04/12/2024	MWZ	Telephone conference with counsel for tort claimant re: possible appeal deadline;	0.30	\$500.00	\$150.00
04/14/2024	MWZ	Multiple emails to TCC members coordinating committee meetings;	0.80	\$500.00	\$400.00

04/15/2024	MWZ	Prepare for call with counsel for public interest group;	0.30	\$500.00	\$150.00
04/15/2024	MWZ	Telephone conference with counsel for public interest groups re: inmate issues and Judge Lopez's ruling;	1.00	\$500.00	\$500.00
04/15/2024	MWZ	Review letter correspondence provided by public interest group to pro se incarcerated claimants;	0.30	\$500.00	\$150.00
04/15/2024	MWZ	Telephone conference with pro se tort claimant re: issues related to the stay of litigation against non-debtors;	0.50	\$500.00	\$250.00
04/15/2024	MWZ	Correspondence with coordinating counsel re: public interest groups' interests;	0.20	\$500.00	\$100.00
04/15/2024	MWZ	Telephone conference with E. Goodman re: settlement issues;	0.50	\$500.00	\$250.00
04/15/2024	MWZ	Review pro se notice of appeal;	0.20	\$500.00	\$100.00
04/15/2024	MWZ	Telephone conference with counsel for public interest group re: possible amicus filings;	1.00	\$500.00	\$500.00
04/16/2024	MWZ	Work on motion for leave to file appeal;	1.30	\$500.00	\$650.00
04/16/2024	MWZ	Prepare for TCC meeting;	0.30	\$500.00	\$150.00
04/16/2024	MWZ	Attend TCC meeting;	1.00	\$500.00	\$500.00
04/16/2024	MWZ	Follow-up telephone conference with counsel for TCC members;	0.70	\$500.00	\$350.00
04/16/2024	MWZ	Emails with TCC members re: outreach to counsel for the Debtor and UCC;	0.20	\$500.00	\$100.00
04/16/2024	MWZ	Work on preparation of issues for potential settlement and plan structure;	1.30	\$500.00	\$650.00
04/17/2024	MWZ	Confer with E. Goodman re: coordinating with Judge Sontchi for mediation;	0.50	\$500.00	\$250.00
04/17/2024	MWZ	Review email exchanges with pro se filer, , and Debtor's counsel,	0.20	\$500.00	\$100.00
04/17/2024	MWZ	Telephone conference with pro se tort claimant, , re: State Court litigation;	0.60	\$500.00	\$300.00
04/17/2024	MWZ	Review pro se tort claimants' filings re: Wyoming successor issues;	0.20	\$500.00	\$100.00
04/18/2024	MWZ	Telephone conference with counsel for public interest groups re: amicus filing and TCC meeting;	0.20	\$500.00	\$100.00
04/18/2024	MWZ	Email with counsel for public interest group re: TCC meeting;	0.20	\$500.00	\$100.00
04/18/2024	MWZ	Telephone conference with counsel from re: YesCare AL contract award;	0.20	\$500.00	\$100.00
04/18/2024	MWZ	Research (factual) re: possible YesCare AL contract award;	0.30	\$500.00	\$150.00
04/18/2024	MWZ	Confer with E. Goodman re: interim fee applications;	0.30	\$500.00	\$150.00
04/18/2024	MWZ	Research (factual) re: pro se tort claimant's motion to substitute parties;	0.30	\$500.00	\$150.00
04/19/2024	MWZ	Telephone conference with counsel for inmate tort claimant re: Judge Lopez's decision and next steps;	0.60	\$500.00	\$300.00
04/19/2024	MWZ	Telephone conference with counsel for TCC members re: case status and strategy;	0.40	\$500.00	\$200.00
04/20/2024	MWZ	Review pro se tort claimants' filed papers seeking to substitute CHS TX and YesCare, and review related emails from Debtor's counsel re: same;	0.90	\$500.00	\$450.00
04/20/2024	MWZ	Research (factual) re: pro se tort claimants' filed papers seeking to substitute CHS TX and YesCare;	0.70	\$500.00	\$350.00
04/21/2024	MWZ	Review revised motion for leave to appeal and emails with TCC members re: same;	0.60	\$500.00	\$300.00
04/22/2024	MWZ	Telephone conference with counsel for tort claimant, , re: case	0.30	\$500.00	\$150.00

		status;			
04/22/2024	MWZ	Work on notice of no objection to motion to compel for pay TCC professional fees;	0.40	\$500.00	\$200.00
04/22/2024	MWZ	Work on analysis and strategy re: pro se State Court motion to substitute parties and emails from Debtor's counsel re: same;	0.80	\$500.00	\$400.00
04/22/2024	MWZ	Review email from Debtor's counsel re: settlement and email TCC members re: same;	0.30	\$500.00	\$150.00
04/22/2024	MWZ	Review emails with counsel for the Debtor and the UCC re: settlement;	0.30	\$500.00	\$150.00
04/22/2024	MWZ	Review Brown Rudnick's fourth fee application and email TCC members re: same;	0.30	\$500.00	\$150.00
04/22/2024	MWZ	Telephone conference with counsel for TCC members re: motion for leave to appeal;	0.20	\$500.00	\$100.00
04/22/2024	MWZ	Email TCC members re:	0.20	\$500.00	\$100.00
04/22/2024	MWZ	Work on preparation for TCC meeting;	0.60	\$500.00	\$300.00
04/23/2024	MWZ	Review letter correspondence from pro se inmate claimant;	0.20	\$500.00	\$100.00
04/23/2024	MWZ	Prepare for TCC meeting and emails re: same;	0.40	\$500.00	\$200.00
04/23/2024	MWZ	Attend TCC meeting;	1.50	\$500.00	\$750.00
04/23/2024	MWZ	Email counsel for the UST re: coordinating a meeting with counsel for the TCC;	0.20	\$500.00	\$100.00
04/23/2024	MWZ	Follow-up emails to TCC members re:	0.20	\$500.00	\$100.00
04/23/2024	MWZ	Telephone conference with counsel for TCC members;	0.60	\$500.00	\$300.00
04/23/2024	MWZ	Follow-up emails re: schedule for settlement conference;	0.20	\$500.00	\$100.00
04/24/2024	MWZ	Final review of motion for leave to appeal before filing;	0.30	\$500.00	\$150.00
04/24/2024	MWZ	Telephone conference with pro se tort claimant, re: request for status conference;	0.20	\$500.00	\$100.00
04/24/2024	MWZ	Confer with E. Goodman re: strategy for settlement negotiations;	1.00	\$500.00	\$500.00
04/24/2024	MWZ	Telephone conference with counsel for UST;	0.50	\$500.00	\$250.00
04/24/2024	MWZ	Review emails re: coordinating mediation conference and mediation privilege issues;	0.20	\$500.00	\$100.00
04/24/2024	MWZ	Review email from Judge Sontchi re: confidential mediation;	0.20	\$500.00	\$100.00
04/24/2024	MWZ	Work on interim fee application;	0.50	\$500.00	\$250.00
04/24/2024	MWZ	Telephone conference with counsel for TCC members re: settlement strategy;	0.70	\$500.00	\$350.00
04/25/2024	MWZ	Confer re: coordinating service of notice of appeal;	0.30	\$500.00	\$150.00
04/25/2024	MWZ	Work on analysis of master mailing list to confirm proper service;	0.40	\$500.00	\$200.00
04/25/2024	MWZ	Draft cover letter and attend to issues re: service;	0.10	\$500.00	\$50.00
04/26/2024	MWZ	Confer with E. Goodman re: mediation preparation;	0.90	\$500.00	\$450.00
04/26/2024	MWZ	Work on mediation materials;	0.50	\$500.00	\$250.00
04/26/2024	MWZ	Work on interim fee application;	0.60	\$500.00	\$300.00
04/27/2024	MWZ	Continue working on strategy issues related to the scheduled mediation;	0.30	\$500.00	\$150.00

04/27/2024	MWZ	Emails with counsel for TCC members re: attending the mediation;	0.30	\$500.00	\$150.00
04/29/2024	MWZ	Prepare for TCC meeting;	0.60	\$500.00	\$300.00
04/29/2024	MWZ	Emails to TCC members re: proposed stipulation and order re: third global mediation;	0.20	\$500.00	\$100.00
04/29/2024	MWZ	Finalize notice of no objection and order;	0.20	\$500.00	\$100.00
04/29/2024	MWZ	Review email from counsel for tort claimant re: self insured retentions and past payments;	0.20	\$500.00	\$100.00
04/29/2024	MWZ	Attend TCC meeting;	1.80	\$500.00	\$900.00
04/29/2024	MWZ	Work on revisions to interim fee application;	0.30	\$500.00	\$150.00
04/29/2024	MWZ	Confer with E. Goodman re: settlement strategy;	0.40	\$500.00	\$200.00
04/29/2024	MWZ	Telephone conference with , counsel for tort claimant re: case status;	0.30	\$500.00	\$150.00
04/30/2024	MWZ	Telephone conference with tort claimants' counsel, : insurance issues and claim valuation issues;	0.80	\$500.00	\$400.00
04/30/2024	MWZ	Work on interim fee application;	1.20	\$500.00	\$600.00
				Services Subtotal	\$31,200.00

Expenses

Date	Notes	Quantity	Rate	Total
04/11/2024	Postage;	1.00	\$0.88	\$0.88
04/16/2024	Airfare to/from Phoenix/New York for mediation;	1.00	\$781.46	\$781.46
04/25/2024	Photocopies;	480.00	\$0.10	\$48.00
04/25/2024	Postage;	40.00	\$1.12	\$44.80
Expenses Subtotal				\$875.14

Time Keeper	Quantity	Rate	Total
Michael Zimmerman	62.4	\$500.00	\$31,200.00
		Subtotal	\$32,075.14
		Total for Current Invoice	\$32,075.14

Detailed Statement of Account**Prior Invoices**

Invoice Number	Invoice Date	Amount Due	Payments Received	Balance Due
7457	12/01/2023	\$20,645.00	\$0.00	\$20,645.00
7458	01/01/2024	\$48,152.89	\$0.00	\$48,152.89
7459	02/01/2024	\$40,070.31	\$0.00	\$40,070.31

Invoice # 7974 - 05/01/2024

7551	03/01/2024	\$43,908.58	\$0.00	\$43,908.58
7793	04/01/2024	\$53,558.68	\$0.00	\$53,558.68

Current Invoice

Invoice Number	Invoice Date	Amount Due	Payments Received	Balance Due
7974	05/01/2024	\$32,075.14	\$0.00	\$32,075.14
			Outstanding Balance	\$238,410.60
			Total Amount Outstanding	\$238,410.60

Please make all amounts payable to: Berry Riddell LLC

Payment is due upon receipt.

EXHIBIT E

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

TEHUM CARE SERVICES, INC.,¹

Debtor.

Chapter 11

Case No. 23-90086 (CML)

**FIFTH FEE STATEMENT OF BERRY RIDDELL LLC FOR COMPENSATION FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS CO-COUNSEL
TO THE OFFICIAL COMMITTEE OF TORT CLAIMANTS FOR THE PERIOD
FROM MAY 1, 2024 THROUGH MAY 31, 2024**

In accordance with the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals [ECF No. 357], each Application Recipient receiving notice of this monthly fee statement shall have until 4:00 p.m. (CT), 14 days after service of this monthly fee statement to object to the fees and expenses requested herein. Upon the expiration of such 14-day period, the Debtor is authorized and directed to pay 80% of the fees and 100% of the expenses requested in this monthly fee statement that are not subject to an objection.

Name of Professional:	Berry Riddell LLC
Authorized to Provide Professional Services to:	Official Committee of Tort Claimants
Date Order of Employment Signed:	January 24, 2024, as of November 21, 2023 [ECF No. 1293]
Time Period Covered:	May 1, 2024 through May 31, 2024
Total Fees Sought:	\$29,760.00
Amount of retainer received in case:	N/A
Total professional fees covered by this statement:	\$37,200.00
Total professional hours covered by this statement:	81.4
Average hourly rate for professionals:	\$457.00
Reimbursable expenses sought in this statement:	\$2,040.48

¹ The last four digits of the Debtor's federal tax identification number is 8853. The Debtor's service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.

Payment requested:	
80% Fees	\$29,760.00
100% Expenses	\$ 2,040.48
Total:	\$31,800.48

Pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules of the United States Bankruptcy Court for the Southern District of Texas (the “Bankruptcy Local Rules”), the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals (the “Interim Compensation Order”), and the Order Authorizing the Employment and Retention of Berry Riddell LLC as Co-Counsel for the Official Committee of Tort Claimants as of November 21, 2023 [ECF No. 1293], the law firm of Berry Riddell LLC (“Berry Riddell”), as co-counsel to the Official Committee of Tort Claimants (the “Committee”) appointed in this chapter 11 case, hereby submits this Fifth Monthly Fee Statement of Berry Riddell LLP for Compensation for Services Rendered and Reimbursement of Expenses as Co-Counsel to the Official Committee of Tort Claimants for the Period from May 1, 2024 through May 31, 2024 (the “Fifth Monthly Fee Statement”). By the Fifth Fee Statement and pursuant to the Interim Compensation Order, Berry Riddell seeks interim payment of (i) \$29,760.00 (80% of \$37,200.00) as compensation for professional services rendered to the Committee, and (ii) \$2,040.48 for reimbursement of actual and necessary expenses, for a total of \$31,800.48 for the period May 1, 2024 through and including May 31, 2024 (the “Fee Period”). Pursuant to the Interim Compensation Order, the Application Recipients have until 4:00 p.m. (CT) on the fourteenth day following service of this Fifth Fee Statement to object to the requested fees and expenses.

Itemization of Services Rendered and Expenses Incurred

1. In support of this Fifth Fee Statement, attached are the following exhibits:

Exhibit A is a schedule of the number of hours expended and fees incurred (on an aggregate basis) by Berry Riddell partners, counsel, associates, consultants and paraprofessionals during the Fee Period with respect to each of the subject matter categories Berry Riddell established in accordance with its internal billing procedures. As reflected in Exhibit A, Berry Riddell incurred \$37,200.00 in fees during the Fee Period. Pursuant to this Fifth Fee Statement, Berry Riddell seeks compensation in the amount of \$29,760.00 or 80% of such fees.

Exhibit B is a schedule providing certain information regarding the Berry Riddell attorneys and paraprofessionals for whose work on this chapter 11 case compensation is sought in this Fifth Monthly Fee Statement. Attorneys and paraprofessionals of Berry Riddell expended a total of 81.4 hours in connection with this chapter 11 case during the Fee Period.

Exhibit C is a schedule setting forth the amount sought with respect to each category of expenses for which reimbursement is sought in this Fifth Fee Statement. This Fifth Fee Statement seeks reimbursement of expenses in the aggregate total amount of \$2,040.48.

Exhibit D consists of Berry Riddell's detailed records of fees and expenses incurred during the Fee Period in rendering professional services to the Committee.

Representations

2. Although Berry Riddell has used its reasonable best efforts to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Fifth Fee Statement due to delays caused by accounting and processing during the Fee Period. Berry Riddell reserves the right to seek payment of such fees and expenses not included herein. Subsequent fee statements will be submitted in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules and the Interim Compensation Order.

WHEREFORE, Berry Riddell respectfully requests compensation and reimbursement of its expenses incurred during the Fee Period in the total amount of \$31,800.48 consisting of (i) \$29,760.00, which is 80% of the fees incurred by the Debtors for reasonable and necessary professional services rendered by Berry Riddell, and (ii) \$2,040.48, which is 100% of actual necessary costs and expenses incurred, in accordance with the procedures set forth in the Interim Compensation Order.

Dated: June 18, 2024
Scottsdale, AZ

Respectfully submitted,

BERRY RIDDELL LLC

/s/ Michael W. Zimmerman

Michael W. Zimmerman (*pro hac vice*)

Martin A. Aronson (*pro hac vice*)

Jeffrey D. Gross (*pro hac vice*)

6750 E. Camelback Road, Suite 100

Scottsdale, AZ 85251

Email: mz@berryriddell.com

ma@berryriddell.com

jg@berryriddell.com

CERTIFICATE OF SERVICE

I certify that on June 18, 2024, I caused a true and correct copy of the foregoing document to be served by the Court's CM/ECF notification system, which will send notice of electronic filing to all counsel of record.

/s/ Lynda Kogutkiewicz

EXHIBIT A

Summary of Hours Expended and Fees Incurred by Matter Category

Compensation by Category		Base Hrs	Base Amount	Billed Hrs	Billed Amount
Category	Employee				
Asset Analysis and Recovery	Michael Zimmerman	0.3	\$ 150.00	0.3	\$ 150.00
Meetings of and Communications with Committee/Creditors	Michael Zimmerman	26.2	\$ 13,100.00	26.2	\$ 13,100.00
Meetings of and Communications with Co-Counsel	Michael Zimmerman	6.4	\$ 3,200.00	6.4	\$ 3,200.00
Fee/Employment Applications	Michael Zimmerman	1.9	\$ 950.00	1.9	\$ 950.00
Contested Matters/Litigation (General)	Michael Zimmerman	4.2	\$ 2,100.00	4.2	\$ 2,100.00
Mediation/Settlement	Michael Zimmerman	28.4	\$ 14,200.00	28.4	\$ 14,200.00
Non-Working Travel @50%	Michael Zimmerman	14	\$ 3,500.00	14	\$ 3,500.00
		81.4	\$37,200.00	81.4	\$ 37,200.00

EXHIBIT B

Summary of Hours Expended and Fees Incurred by Professional

Compensation by Professional

Name of Attorney	Position; Admission Date	Hourly Billing Rate	Total Hours	Total Compensation
Michael Zimmerman	Partner; Admitted AZ 2009	\$ 500.00	67.4	\$ 33,700.00
Michael Zimmerman	Partner; Admitted AZ 2009	\$250.00	14	\$ 3,500.00
Professional Blended Rate		\$457.00	\$	\$ 37,200.00

EXHIBIT C

Record of Expenses

Billed Disbursements			Rate (\$)	Billable (\$)
Date	Quantity	Description		
4/18/2024	1	Hot Shot Delivery Inc.: Records Request/Delivery;	\$ 67.16	\$ 67.19
4/23/2024	1	Hot Shot Delivery Inc.: Records Request;	\$ 48.30	\$ 48.30
5/4/2024	1	Taxi on 5/4 in New York for mediation;	\$ 70.97	\$ 70.97
5/7/2024	1	Pacer Fees;	\$ 129.90	\$ 129.90
5/7/2024	1	Hotel in New York 5/4-5/7 in New York for mediation;	\$ 1,405.05	\$ 1,405.05
5/7/2024	1	Taxi on 5/7 in New York for mediation;	\$ 101.32	\$ 101.32
5/7/2024	1	Taxi on 5/7 return from New York for mediation;	\$ 35.00	\$ 35.00
5/8/2024	200	Photocopies;	\$ 0.10	\$ 20.00
5/8/2024	40	Postage;	\$ 0.88	\$ 35.20
5/17/2024	844	Photocopies	\$ 0.10	\$ 84.40
5/20/2024	1	Postage;	\$ 23.10	\$ 23.10
5/20/2024	1	Postage;	\$ 20.05	\$ 20.05
				\$ 2,040.48

EXHIBIT D

Detailed Record of Time Entries

BERRY | RIDDELL LLC

6750 E. Camelback Road, Suite 100
Scottsdale, AZ 85251
Phone: 480-385-2727

INVOICE

Invoice # 8364
Date: 06/01/2024
Due Upon Receipt

Committee of Tort Claimants

Committee of Tort Claimants/Tehum Care Services, Inc.

Services

Date	Timekeeper	Notes	Quantity	Rate	Total
05/01/2024	MWZ	Review filed stipulation re: third mediation and emails re: same;	0.20	\$500.00	\$100.00
05/01/2024	MWZ	Confer with E. Goodman re: settlement strategy and	0.50	\$500.00	\$250.00
05/02/2024	MWZ	Telephone conference with counsel for TCC members re: mediation preparation;	0.40	\$500.00	\$200.00
05/02/2024	MWZ	Review materials re: mediation preparation;	0.80	\$500.00	\$400.00
05/02/2024	MWZ	Work on slides re: strategy for mediation and possible settlement structure;	0.80	\$500.00	\$400.00
05/02/2024	MWZ	Work on monthly fee application;	0.60	\$500.00	\$300.00
05/03/2024	MWZ	Telephone conference with re: mediation preparation;	0.50	\$500.00	\$250.00
05/03/2024	MWZ	Telephone conference with E. Goodman re: settlement strategy;	0.50	\$500.00	\$250.00
05/03/2024	MWZ	Emails and telephone conference with counsel for the TCC members;	1.10	\$500.00	\$550.00
05/03/2024	MWZ	Telephone conference with counsel for tort claimant, re: emails, mediation schedule, claimants' jury trial and claim;	0.30	\$500.00	\$150.00
05/03/2024	MWZ	Work on analysis of settlement materials and Province materials;	0.60	\$500.00	\$300.00
05/03/2024	MWZ	Telephone conference with counsel for TCC members re: mediation preparation;	0.80	\$500.00	\$400.00
05/04/2024	MWZ	Travel from Phoenix to New York (50% rate);	7.00	\$250.00	\$1,750.00
05/05/2024	MWZ	Emails with TCC members re: mediation issues;	0.60	\$500.00	\$300.00
05/05/2024	MWZ	Telephone conferences with TCC members and counsel re: mediation;	3.40	\$500.00	\$1,700.00
05/05/2024	MWZ	Work on preparation for mediation;	2.80	\$500.00	\$1,400.00
05/05/2024	MWZ	Telephone conference with counsel for TCC members re: mediation issues;	1.30	\$500.00	\$650.00
05/06/2024	MWZ	Attend mediation with Judge Sontchi;	10.00	\$500.00	\$5,000.00
05/07/2024	MWZ	Travel from New York to Phoenix (50% rate);	7.00	\$250.00	\$1,750.00
05/08/2024	MWZ	Work on proposed term sheet;	0.90	\$500.00	\$450.00
05/08/2024	MWZ	Prepare notice of service re: appellants' statement of issues on appeal and attend to service issues;	0.40	\$500.00	\$200.00
05/08/2024	MWZ	Telephone conference with counsel for TCC members re: insurance issues;	0.60	\$500.00	\$300.00

05/08/2024	MWZ	Review joint response by the Debtor and the UCC to the TCC's appeal;	0.30	\$500.00	\$150.00
05/08/2024	MWZ	Review public interest group's amicus filing re: appeal;	0.30	\$500.00	\$150.00
05/08/2024	MWZ	Email TCC members re: case status;	0.30	\$500.00	\$150.00
05/09/2024	MWZ	Work on revisions to the proposed term sheet;	0.80	\$500.00	\$400.00
05/09/2024	MWZ	Emails re: proposed work on analysis of mediation disclosures;	1.40	\$500.00	\$700.00
05/09/2024	MWZ	Work on analysis of potential settlement plans;	1.40	\$500.00	\$700.00
05/09/2024	MWZ	Attend meeting with re: case status;	0.60	\$500.00	\$300.00
05/09/2024	MWZ	Telephone conference with counsel for TCC member re: mediation status and appeal issues;	0.40	\$500.00	\$200.00
05/10/2024	MWZ	Attend meeting with counsel for tort claimant re: opt out issues;	1.00	\$500.00	\$500.00
05/10/2024	MWZ	Work on mediation strategy with E. Goodman;	0.80	\$500.00	\$400.00
05/10/2024	MWZ	Attend meeting with counsel for the UCC and E. Goodman re: mediation;	0.50	\$500.00	\$250.00
05/10/2024	MWZ	Email TCC members re: mediation issues and potential insurance counsel;	0.30	\$500.00	\$150.00
05/10/2024	MWZ	Work on review of draft employment application for insurance counsel;	0.30	\$500.00	\$150.00
05/10/2024	MWZ	Telephone conference with counsel for TCC members re: mediation proposals;	0.50	\$500.00	\$250.00
05/10/2024	MWZ	Telephone conference with pro se tort claimant re: case status;	0.20	\$500.00	\$100.00
05/10/2024	MWZ	Work on mediation issues re: YesCare financials;	0.40	\$500.00	\$200.00
05/13/2024	MWZ	Review and follow-up with co-counsel E. Goodman re: UCC's request for time extension;	0.20	\$500.00	\$100.00
05/13/2024	MWZ	Finalize fourth fee application and email same to the TCC;	0.30	\$500.00	\$150.00
05/13/2024	MWZ	Review filings from pro se claimant;	0.20	\$500.00	\$100.00
05/13/2024	MWZ	Prepare for TCC meeting;	0.60	\$500.00	\$300.00
05/13/2024	MWZ	Follow-up with counsel for TCC members re: mediation status;	0.80	\$500.00	\$400.00
05/13/2024	MWZ	Work on potential motion for sanctions;	0.60	\$500.00	\$300.00
05/14/2024	MWZ	Prepare for TCC meeting;	0.60	\$500.00	\$300.00
05/14/2024	MWZ	Attend TCC meeting;	1.20	\$500.00	\$600.00
05/14/2024	MWZ	Emails to TCC members re: scheduling future meetings;	0.40	\$500.00	\$200.00
05/14/2024	MWZ	Emails and telephone conference with counsel for the UCC re: joint settlement proposal;	0.30	\$500.00	\$150.00
05/15/2024	MWZ	Review and analyze correspondence from , counsel for the M2 parties;	0.30	\$500.00	\$150.00
05/15/2024	MWZ	Multiple conferences with E. Goodman re: mediation issues;	1.00	\$500.00	\$500.00
05/15/2024	MWZ	Emails with counsel for the UCC re: mediation issues;	0.30	\$500.00	\$150.00
05/15/2024	MWZ	Prepare for and attend meeting with counsel for the UCC;	0.50	\$500.00	\$250.00
05/16/2024	MWZ	Review emails from counsel for M2 parties and the UCC and follow-up re: same;	0.60	\$500.00	\$300.00
05/16/2024	MWZ	Emails with TCC members and counsel;	0.40	\$500.00	\$200.00
05/16/2024	MWZ	Telephone conference with counsel for TCC members re: case status	0.80	\$500.00	\$400.00

		issues;			
05/16/2024	MWZ	Review correspondence from pro se inmates and follow-up on their requests for additional information;	0.30	\$500.00	\$150.00
05/16/2024	MWZ	Review tort claimant's motion for relief from the automatic stay;	0.30	\$500.00	\$150.00
05/17/2024	MWZ	Review and respond to emails from Debtor's counsel re: mediation;	0.30	\$500.00	\$150.00
05/17/2024	MWZ	Telephone conference with counsel for tort claimant, re: case status;	0.30	\$500.00	\$150.00
05/17/2024	MWZ	Emails and telephone conference with Judge Sontchi re: mediation;	1.00	\$500.00	\$500.00
05/17/2024	MWZ	Confer with E. Goodman re: settlement proposal;	0.30	\$500.00	\$150.00
05/17/2024	MWZ	Telephone conference with counsel for TCC members re: case status;	0.70	\$500.00	\$350.00
05/18/2024	MWZ	Work on analysis of issues re: potential settlement;	1.50	\$500.00	\$750.00
05/20/2024	MWZ	Work on issues re: settlement and emails with counsel for the UCC re: same;	0.80	\$500.00	\$400.00
05/20/2024	MWZ	Finalize letters to pro se incarcerated claimants re: document requests;	0.20	\$500.00	\$100.00
05/20/2024	MWZ	Confer with counsel for the UCC re: settlement proposal and next steps;	1.00	\$500.00	\$500.00
05/20/2024	MWZ	Email TCC members and counsel re: settlement offer and proposed counteroffer;	0.80	\$500.00	\$400.00
05/20/2024	MWZ	Telephone conference with counsel for TCC members re: settlement status;	0.50	\$500.00	\$250.00
05/20/2024	MWZ	Confer with E. Goodman re: mediation issues;	0.60	\$500.00	\$300.00
05/20/2024	MWZ	Prepare for TCC meeting;	0.80	\$500.00	\$400.00
05/21/2024	MWZ	Prepare for and attend TCC meeting;	0.40	\$500.00	\$200.00
05/21/2024	MWZ	Emails with TCC members re: settlement status;	0.30	\$500.00	\$150.00
05/21/2024	MWZ	Telephone conference with representative from the Tennessee Procurement Office re: status of YesCare's request for proposal;	0.30	\$500.00	\$150.00
05/21/2024	MWZ	Attend TCC meeting and follow-up conference with coordinating counsel and M. Atkinson;	1.30	\$500.00	\$650.00
05/21/2024	MWZ	Attend to correspondence with counsel for the UCC re: mediation issues;	0.40	\$500.00	\$200.00
05/21/2024	MWZ	Review and address emails from Judge Sontchi re: mediation issues;	0.30	\$500.00	\$150.00
05/21/2024	MWZ	Confer with E Goodman re: mediation issues;	0.90	\$500.00	\$450.00
05/21/2024	MWZ	Attend meeting with Judge Sontchi, ; and E. Goodman;	1.00	\$500.00	\$500.00
05/21/2024	MWZ	Confer with E. Goodman re: mediation issues;	0.40	\$500.00	\$200.00
05/22/2024	MWZ	Work on mediation proposed terms and correspondence with Judge Sontchi;	0.90	\$500.00	\$450.00
05/22/2024	MWZ	Review Province's monthly fee application and emails to TCC members re: same;	0.40	\$500.00	\$200.00
05/22/2024	MWZ	Review and respond to email from pro se claimant	0.20	\$500.00	\$100.00
05/23/2024	MWZ	Emails with TCC members and their counsel re: Province's monthly fee application;	0.30	\$500.00	\$150.00
05/23/2024	MWZ	Review email from and telephone conference with counsel for tort claimant, re: case status;	0.30	\$500.00	\$150.00
05/23/2024	MWZ	Review pro se filings;	0.20	\$500.00	\$100.00

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05/23/2024	MWZ	Confer with E. Goodman re: case status and mediation strategy;	0.80	\$500.00	\$400.00
05/24/2024	MWZ	Telephone conference with counsel for TCC members re: case status and mediation;	0.50	\$500.00	\$250.00
05/24/2024	MWZ	Confer with E. Goodman re: mediation counteroffers and work on email re: same;	0.40	\$500.00	\$200.00
05/24/2024	MWZ	Review Debtor's monthly operating report;	0.20	\$500.00	\$100.00
05/24/2024	MWZ	Review Debtors' response to motion to lift the automatic stay;	0.20	\$500.00	\$100.00
05/28/2024	MWZ	Prepare for TCC meeting;	0.80	\$500.00	\$400.00
05/28/2024	MWZ	Attend TCC meeting;	0.90	\$500.00	\$450.00
05/28/2024	MWZ	Emails with counsel for TCC members;	0.30	\$500.00	\$150.00
05/28/2024	MWZ	Review motion for relief from stay filed by	0.20	\$500.00	\$100.00
05/30/2024	MWZ	Review case docket and review recent notices;	0.20	\$500.00	\$100.00
05/31/2024	MWZ	Review and follow-up email from tort claimants;	0.20	\$500.00	\$100.00
				Services Subtotal	\$37,200.00

Expenses

Date	Notes	Quantity	Rate	Total
04/18/2024	Hot Shot Delivery, Inc.: Records Request;	1.00	\$47.00	\$47.00
04/18/2024	Hot Shot Delivery, Inc.: Records to Berry Riddell;	1.00	\$20.19	\$20.19
04/23/2024	Hot Shot Delivery, Inc.: Records Request;	1.00	\$48.30	\$48.30
05/07/2024	Pacer Fees;	1.00	\$129.90	\$129.90
05/07/2024	Hotel in New York 5/4-5/7 in New York for mediation;	1.00	\$1,405.05	\$1,405.05
05/07/2024	Taxi on 5/7 in New York for mediation;	1.00	\$101.32	\$101.32
05/07/2024	Taxi on 5/4 in New York for mediation;	1.00	\$70.97	\$70.97
05/07/2024	Taxi on 5/7 return from New York for mediation;	1.00	\$35.00	\$35.00
05/08/2024	Photocopies;	200.00	\$0.10	\$20.00
05/08/2024	Postage;	40.00	\$0.88	\$35.20
05/17/2024	Copies;	844.00	\$0.10	\$84.40
05/20/2024	Postage;	1.00	\$23.10	\$23.10
05/20/2024	Postage;	1.00	\$20.05	\$20.05
Expenses Subtotal				\$2,040.48
Subtotal				\$39,240.48
Total for Current Invoice				\$39,240.48

Detailed Statement of Account**Prior Invoices**

Invoice Number	Invoice Date	Amount Due	Payments Received	Balance Due
7457	12/01/2023	\$20,645.00	\$0.00	\$20,645.00
7458	01/01/2024	\$48,152.89	\$0.00	\$48,152.89
7459	02/01/2024	\$40,070.31	\$0.00	\$40,070.31
7551	03/01/2024	\$43,908.58	\$0.00	\$43,908.58
7793	04/01/2024	\$53,558.68	\$0.00	\$53,558.68
7974	05/01/2024	\$32,075.14	\$0.00	\$32,075.14

Current Invoice

Invoice Number	Invoice Date	Amount Due	Payments Received	Balance Due
8364	06/01/2024	\$39,240.48	\$0.00	\$39,240.48
Outstanding Balance				\$277,651.08
Total Amount Outstanding				\$277,651.08

Please make all amounts payable to: Berry Riddell LLC

Payment is due upon receipt.

EXHIBIT F

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

TEHUM CARE SERVICES, INC.,¹

Debtor.

Chapter 11

Case No. 23-90086 (CML)

**SIXTH FEE STATEMENT OF BERRY RIDDELL LLC FOR COMPENSATION FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS CO-COUNSEL
TO THE OFFICIAL COMMITTEE OF TORT CLAIMANTS FOR THE PERIOD
FROM JUNE 1, 2024 THROUGH JUNE 30, 2024**

In accordance with the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals [ECF No. 357], each Application Recipient receiving notice of this monthly fee statement shall have until 4:00 p.m. (CT), 14 days after service of this monthly fee statement to object to the fees and expenses requested herein. Upon the expiration of such 14-day period, the Debtor is authorized and directed to pay 80% of the fees and 100% of the expenses requested in this monthly fee statement that are not subject to an objection.

Name of Professional:	Berry Riddell LLC
Authorized to Provide Professional Services to:	Official Committee of Tort Claimants
Date Order of Employment Signed:	January 24, 2024, as of November 21, 2023 [ECF No. 1293]
Time Period Covered:	June 1, 2024 through June 30, 2024
Total Fees Sought:	\$13,320.00
Amount of retainer received in case:	N/A
Total professional fees covered by this statement:	\$16,650.00
Total professional hours covered by this statement:	33.3
Average hourly rate for professionals:	\$500.00
Reimbursable expenses sought in this statement:	\$0

¹ The last four digits of the Debtor's federal tax identification number is 8853. The Debtor's service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.

Payment requested:	
80% Fees	\$13,320.00
100% Expenses	\$ 0
Total:	\$13,320.00

Pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules of the United States Bankruptcy Court for the Southern District of Texas (the “Bankruptcy Local Rules”), the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals (the “Interim Compensation Order”), and the Order Authorizing the Employment and Retention of Berry Riddell LLC as Co-Counsel for the Official Committee of Tort Claimants as of November 21, 2023 [ECF No. 1293], the law firm of Berry Riddell LLC (“Berry Riddell”), as co-counsel to the Official Committee of Tort Claimants (the “Committee”) appointed in this chapter 11 case, hereby submits this Sixth Monthly Fee Statement of Berry Riddell LLP for Compensation for Services Rendered and Reimbursement of Expenses as Co-Counsel to the Official Committee of Tort Claimants for the Period from June 1, 2024 through June 30, 2024 (the “Sixth Monthly Fee Statement”). By the Sixth Fee Statement and pursuant to the Interim Compensation Order, Berry Riddell seeks interim payment of (i) \$13,320.00 (80% of \$16,650.00) as compensation for professional services rendered to the Committee, and (ii) \$0 for reimbursement of actual and necessary expenses, for a total of \$13,320.00 for the period June 1, 2024 through and including June 30, 2024 (the “Fee Period”). Pursuant to the Interim Compensation Order, the Application Recipients have until 4:00 p.m. (CT) on the fourteenth day following service of this Sixth Fee Statement to object to the requested fees and expenses.

Itemization of Services Rendered and Expenses Incurred

1. In support of this Sixth Fee Statement, attached are the following exhibits:

Exhibit A is a schedule of the number of hours expended and fees incurred (on an aggregate basis) by Berry Riddell partners, counsel, associates, consultants and paraprofessionals during the Fee Period with respect to each of the subject matter categories Berry Riddell established in accordance with its internal billing procedures. As reflected in Exhibit A, Berry Riddell incurred \$16,650.00 in fees during the Fee Period. Pursuant to this Sixth Fee Statement, Berry Riddell seeks compensation in the amount of \$13,320.00 or 80% of such fees.

Exhibit B is a schedule providing certain information regarding the Berry Riddell attorneys and paraprofessionals for whose work on this chapter 11 case compensation is sought in this Sixth Monthly Fee Statement. Attorneys and paraprofessionals of Berry Riddell expended a total of 33.3 hours in connection with this chapter 11 case during the Fee Period.

Exhibit C is a schedule setting forth the amount sought with respect to each category of expenses for which reimbursement is sought in this Sixth Fee Statement. This Sixth Fee Statement seeks reimbursement of expenses in the aggregate total amount of \$0.

Exhibit D consists of Berry Riddell's detailed records of fees and expenses incurred during the Fee Period in rendering professional services to the Committee.

Representations

2. Although Berry Riddell has used its reasonable best efforts to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Sixth Fee Statement due to delays caused by accounting and processing during the Fee Period. Berry Riddell reserves the right to seek payment of such fees and expenses not included herein. Subsequent fee statements will be submitted in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules and the Interim Compensation Order.

WHEREFORE, Berry Riddell respectfully requests compensation and reimbursement of its expenses incurred during the Fee Period in the total amount of \$16,650.00 consisting of (i) \$13,320.00, which is 80% of the fees incurred by the Debtors for reasonable and necessary professional services rendered by Berry Riddell, and (ii) \$0, which is 100% of actual necessary costs and expenses incurred, in accordance with the procedures set forth in the Interim Compensation Order.

Dated: July 24, 2024
Scottsdale, AZ

Respectfully submitted,

BERRY RIDDELL LLC

/s/ Michael W. Zimmerman

Michael W. Zimmerman (*pro hac vice*)

Martin A. Aronson (*pro hac vice*)

Jeffrey D. Gross (*pro hac vice*)

6750 E. Camelback Road, Suite 100

Scottsdale, AZ 85251

Email: mz@berryriddell.com

ma@berryriddell.com

jd@berryriddell.com

CERTIFICATE OF SERVICE

I certify that on July 24, 2024, I caused a true and correct copy of the foregoing document to be served by the Court's CM/ECF notification system, which will send notice of electronic filing to all counsel of record.

/s/ Lynda Kogutkiewicz

EXHIBIT A

Summary of Hours Expended and Fees Incurred by Matter Category

Compensation by Category		Base Hrs	Base Amount	Billed Hrs	Billed Amount
Category	Employee				
Meetings of and Communications with Committee/Creditors	Michael Zimmerman	15.1	\$ 7,550.00	15.1	\$ 7,550.00
Meetings of and Communications with Co-Counsel	Michael Zimmerman	4.9	\$ 2,450.00	4.9	\$ 2,450.00
Fee/Employment Applications	Michael Zimmerman	2	\$ 1,000.00	2	\$ 1,000.00
Fee/Employment Objections	Michael Zimmerman	0.4	\$ 200.00	0.4	\$ 200.00
Contested Matters/Litigation (General)	Michael Zimmerman	3.6	\$ 2,350.00	3.6	\$ 2,350.00
Mediation/Settlement	Michael Zimmerman	6.8	\$ 2,850.00	6.8	\$ 2,850.00
Court Appearance	Michael Zimmerman	0.5	\$ 250.00	0.5	\$ 250.00
		33.3	\$16,650.00	33.3	\$ 16,650.00

EXHIBIT B

Summary of Hours Expended and Fees Incurred by Professional

Compensation by Professional

Name of Attorney	Position; Admission Date	Hourly Billing Rate	Total Hours	Total Compensation
Michael Zimmerman	Partner; Admitted AZ 2009	\$ 500.00	33.3	\$ 16,650.00
Professional Blended Rate		\$500.00		\$ 16,650.00

EXHIBIT C

Record of Expenses

Date	Quantity	Billed Disbursements Description	Rate (\$)	Billable (\$)

\$ -

EXHIBIT D

Detailed Record of Time Entries

BERRY | RIDDELL LLC

6750 E. Camelback Road, Suite 100
Scottsdale, AZ 85251
Phone: 480-385-2727

INVOICE

Invoice # 8567
Date: 07/01/2024
Due Upon Receipt

Committee of Tort Claimants

Committee of Tort Claimants/Tehum Care Services, Inc.

Date	Timekeeper	Notes	Quantity	Rate	Total
06/02/2024	MWZ	Emails and telephone calls with coordinating counsel, E. Goodman, re: coordinating call with Judge Sontchi;	0.30	\$500.00	\$150.00
06/02/2024	MWZ	Conference with Judge Sontchi and E. Goodman re: mediation issues;	0.80	\$500.00	\$400.00
06/02/2024	MWZ	Conference with E. Goodman re: mediation strategy;	0.70	\$500.00	\$350.00
06/03/2024	MWZ	Emails with E. Goodman re: mediation issues;	0.40	\$500.00	\$200.00
06/03/2024	MWZ	Telephone calls with counsel for TCC members re: mediation status and strategy;	1.30	\$500.00	\$650.00
06/03/2024	MWZ	Review of fourth application for Province and follow-up emails with M. Atkinson re: filing same;	0.30	\$500.00	\$150.00
06/03/2024	MWZ	Review correspondence with R. Perry at Ankura and follow-up re: same;	0.30	\$500.00	\$150.00
06/03/2024	MWZ	Work on analysis of counteroffer, work on strategy re: response and conference with E. Goodman re: same;	1.60	\$500.00	\$800.00
06/03/2024	MWZ	Review and analyze recent filings on the docket;	0.30	\$500.00	\$150.00
06/04/2024	MWZ	Prepare for TCC meeting;	0.80	\$500.00	\$400.00
06/04/2024	MWZ	Attend TCC meeting;	1.00	\$500.00	\$500.00
06/04/2024	MWZ	Conference with counsel for TCC members re: mediation issues and settlement proposal;	0.60	\$500.00	\$300.00
06/04/2024	MWZ	Emails with TCC members re: June 11, 2024 status conference;	0.30	\$500.00	\$150.00
06/05/2024	MWZ	Work on issues re: mediation and possible settlement terms;	0.80	\$500.00	\$400.00
06/05/2024	MWZ	Review emails from counsel for tort claimant and follow-up telephone call with counsel for tort claimant re: case status;	0.40	\$500.00	\$200.00
06/05/2024	MWZ	Analyze possible recovery in separate settlement proposals;	0.40	\$500.00	\$200.00
06/05/2024	MWZ	Emails with Judge Sontchi coordinating mediation conference;	0.20	\$500.00	\$100.00
06/05/2024	MWZ	Attend meeting with Judge Sontchi, E. Goodman and M. Atkinson re: mediation;	0.80	\$500.00	\$400.00
06/05/2024	MWZ	Meeting with co-counsel, E. Goodman, re: mediation issues and possible settlement issue;	0.50	\$500.00	\$250.00
06/05/2024	MWZ	Emails with TCC members and their counsel coordinating an emergency meeting;	0.40	\$500.00	\$200.00
06/06/2024	MWZ	Prepare for emergency TCC meeting;	0.70	\$500.00	\$350.00

06/06/2024	MWZ	Emails with counsel for TCC members re: emergency meeting;	0.30	\$500.00	\$150.00
06/06/2024	MWZ	Attend TCC meeting and attend to follow-up emails re: the meeting;	0.60	\$500.00	\$300.00
06/06/2024	MWZ	Telephone call with M. Vigil, counsel for tort claimant re: case status;	0.30	\$500.00	\$150.00
06/06/2024	MWZ	Telephone call with J. Bertrand, counsel for tort claimant re: case status;	0.20	\$500.00	\$100.00
06/10/2024	MWZ	Work on correspondence to Judge Sontchi re: mediation and status conference;	0.20	\$500.00	\$100.00
06/10/2024	MWZ	Conference with E. Goodman re: mediation issues;	0.50	\$500.00	\$250.00
06/10/2024	MWZ	Prepare for TCC meeting;	0.40	\$500.00	\$200.00
06/10/2024	MWZ	Attend TCC meeting;	0.50	\$500.00	\$250.00
06/10/2024	MWZ	Follow-up conferences with counsel for TCC members re: mediation;	0.30	\$500.00	\$150.00
06/10/2024	MWZ	Review case docket and telephone conference with pro se filer (L. Medley) re: case status;	0.20	\$500.00	\$100.00
06/10/2024	MWZ	Telephone conference with counsel for TCC members re: mediation process;	0.80	\$500.00	\$400.00
06/10/2024	MWZ	Confer with E. Goodman re: mediation issues and insurance analysis;	0.40	\$500.00	\$200.00
06/10/2024	MWZ	Review supplemental papers re: motion to lift the automatic stay filed by B. Horowitz;	0.20	\$500.00	\$100.00
06/10/2024	MWZ	Emails with J. Brookner re: hearing status;	0.20	\$500.00	\$100.00
06/11/2024	MWZ	Emails with counsel for TCC members re: hearing on the motion to lift the automatic stay;	0.20	\$500.00	\$100.00
06/11/2024	MWZ	Attend hearing on the motion to lift the automatic stay;	0.50	\$500.00	\$250.00
06/11/2024	MWZ	Follow-up calls with N. Zuluticky and E. Goodman re: mediation;	0.20	\$500.00	\$100.00
06/11/2024	MWZ	Emails and telephone conference with TCC members re: case status and mediation;	0.40	\$500.00	\$200.00
06/11/2024	MWZ	Telephone conference with counsel for TCC members re: mediation and insurance issues;	0.50	\$500.00	\$250.00
06/12/2024	MWZ	Emails re: extending deadline to objection to MoloLamkin retention;	0.20	\$500.00	\$100.00
06/12/2024	MWZ	Work on monthly fee application;	0.60	\$500.00	\$300.00
06/13/2024	MWZ	Telephone conference with counsel for possible tort claimant and follow-up email re: Judge Lopez's decision and the online docket;	0.30	\$500.00	\$150.00
06/17/2024	MWZ	Emails to TCC members re: scheduling committee meetings;	0.40	\$500.00	\$200.00
06/17/2024	MWZ	Work on fifth interim fee application;	0.40	\$500.00	\$200.00
06/17/2024	MWZ	Review Province's fifth interim fee application and email TCC re: same;	0.30	\$500.00	\$150.00
06/17/2024	MWZ	Review and analyze reimbursement request from counsel for TCC members and emails re: same;	0.40	\$500.00	\$200.00
06/17/2024	MWZ	Telephone conference with counsel for tort claimant re: case status;	0.20	\$500.00	\$100.00
06/18/2024	MWZ	Prepare for TCC meeting;	0.20	\$500.00	\$100.00
06/18/2024	MWZ	Review debtor's response to Winhurst motion to lift the automatic stay;	0.30	\$500.00	\$150.00
06/18/2024	MWZ	Attend TCC Committee meeting;	0.50	\$500.00	\$250.00
06/18/2024	MWZ	Emails with counsel for TCC meeting re: mediation issues;	0.40	\$500.00	\$200.00
06/20/2024	MWZ	Review IRS updates re: ERC processing;	0.30	\$500.00	\$150.00

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06/23/2024	MWZ	Review District Court's denial of the motion for leave to appeal;	0.40	\$500.00	\$200.00
06/23/2024	MWZ	Email TCC members re: District Court's denial of the motion for leave to appeal;	0.20	\$500.00	\$100.00
06/23/2024	MWZ	Review pro se notice of suggestion of illegal activities;	0.20	\$500.00	\$100.00
06/23/2024	MWZ	Telephone conference with E. Goodman re: mediation strategy and case status;	0.60	\$500.00	\$300.00
06/24/2024	MWZ	Telephone conference with counsel for TCC members re: mediation issues;	0.50	\$500.00	\$250.00
06/24/2024	MWZ	Prepare for TCC meeting;	0.50	\$500.00	\$250.00
06/24/2024	MWZ	Telephone conference with counsel for TCC member re: mediation status and strategy;	0.40	\$500.00	\$200.00
06/25/2024	MWZ	Attend TCC meeting;	1.00	\$500.00	\$500.00
06/25/2024	MWZ	Follow-up emails with TCC members and their counsel;	0.30	\$500.00	\$150.00
06/25/2024	MWZ	Work on issues re: mediation and correspondence with coordinating counsel re: same;	0.30	\$500.00	\$150.00
06/25/2024	MWZ	Email Judge Sontchi re: mediation status;	0.20	\$500.00	\$100.00
06/25/2024	MWZ	Review Tennessee Department of Revenue's proof of claim;	0.20	\$500.00	\$100.00
06/26/2024	MWZ	Emails and telephone conference with TCC members re: mediation issues;	0.30	\$500.00	\$150.00
06/26/2024	MWZ	Telephone conference with TCC member, A. Slocum, re: mediator issues;	0.40	\$500.00	\$200.00
06/26/2024	MWZ	Telephone conference with N. Zuluticky and Z. Hemenway re: mediation status;	0.20	\$500.00	\$100.00
06/26/2024	MWZ	Emails with Judge Sontachi re: mediation status and issues;	0.20	\$500.00	\$100.00
06/26/2024	MWZ	Follow-up conference with coordinating counsel re: mediation status;	0.40	\$500.00	\$200.00
06/27/2024	MWZ	Review emails from debtor's counsel re: objection deadline to retention of MoloLampkin;	0.20	\$500.00	\$100.00
06/27/2024	MWZ	Analyze the Harrington v. Purdue Pharma decision;	1.10	\$500.00	\$550.00
06/27/2024	MWZ	Review case docket and recent pro se filings;	0.30	\$500.00	\$150.00
06/27/2024	MWZ	Email TCC members re: mediation status;	0.20	\$500.00	\$100.00
06/28/2024	MWZ	Research proof of claim to respond to creditor inquiry;	0.20	\$500.00	\$100.00
06/28/2024	MWZ	Telephone conference with counsel for claimant re: creditor inquiry;	0.20	\$500.00	\$100.00
06/28/2024	MWZ	Confer with E. Goodman re: mediation status and strategy;	0.50	\$500.00	\$250.00
				Subtotal	\$16,650.00
				Total for Current Invoice	\$16,650.00

Detailed Statement of Account

Prior Invoices

Invoice Number	Invoice Date	Amount Due	Payments Received	Balance Due
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Invoice # 8567 - 07/01/2024

7457	12/01/2023	\$20,645.00	\$0.00	\$20,645.00
7458	01/01/2024	\$48,152.89	\$0.00	\$48,152.89
7459	02/01/2024	\$40,070.31	\$0.00	\$40,070.31
7551	03/01/2024	\$43,908.58	\$0.00	\$43,908.58
7793	04/01/2024	\$53,558.68	\$0.00	\$53,558.68
7974	05/01/2024	\$32,075.14	\$0.00	\$32,075.14
8364	06/01/2024	\$39,240.48	\$0.00	\$39,240.48

Current Invoice

Invoice Number	Invoice Date	Amount Due	Payments Received	Balance Due
8567	07/01/2024	\$16,650.00	\$0.00	\$16,650.00
			Outstanding Balance	\$294,301.08
			Total Amount Outstanding	\$294,301.08

Please make all amounts payable to: Berry Riddell LLC

Payment is due upon receipt.